

EXHIBIT L

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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EASTERN PROFIT CORPORATION LIMITED,

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Plaintiff/Counterclaim Defendant,

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-against- Case No. 18-cv-2185 (JGK)

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STRATEGIC VISION US, LLC,

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Defendant/Counterclaim Plaintiff,

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-against-

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GUO WENGUI a/k/a MILES KWOK,

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Counterclaim Defendant.

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CONTINUED DEPOSITION OF

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GUO WENGUI

17

New York, New York

18

December 4, 2019

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REPORTED BY: TERRI FUDENS

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FILE NO: AD0BC41

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<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>APPEARANCES:</p> <p>PEPPER HAMILTON LLP Attorneys for Plaintiff/Counterclaim Defendant - Eastern Profit Corporation, Ltd. 1313 North Market Street Suite 5100 Wilmington, Delaware 19801</p> <p>BY: CHRIS CHUFF, ESQ.</p> <p>GRAVES GARETT LLC Attorneys for Defendant/Counterclaim Plaintiff - Strategic Vision US LLC 1100 Main Street, Suite 2700 Kansas City, Missouri 64105 816.2563181</p> <p>BY: EDWARD D. GREIM, ESQ. edgreim@gravesgarrett.com</p> <p>JENNIFER DONNELLI, ESQ. jdonnelli@gravesgarrett.com</p> <p>GOLDEN SPRING (NEW YORK) LTD. In-House Counsel for Golden Spring 162 E. 64th Street New York, New York 10065 917.941.9698</p> <p>BY: DANIEL PODHASKIE, ESQ.</p> <p>HODGSON RUSS Attorneys for Guo Wengui a/k/a Miles Kwok, a Counterclaim Defendant 605 Third Avenue, Suite 2300 New York, New York 10158 646.218.7616</p> <p>BY: MARK A. HARMON, ESQ. ERIN TESKE, ESQ.</p> <p style="text-align: right;">Page 236</p>	<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>I N D E X</p> <p>WITNESS: EXAMINATION BY: PAGES:</p> <p>Guo Wengui Mr. Greim 240</p> <p>E X H I B I T S</p> <p>GUO: DESCRIPTION: PAGES:</p> <p>10 A black page with a label on 243 the front which begins with Bates number SVUS 1305 through 1440</p> <p style="text-align: right;">Page 238</p>

2 (Pages 235 to 238)

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<p>1 THE VIDEOGRAPHER: Good morning. 2 The time is 11:09 a.m., Wednesday, 3 December 4, 2019. This is media 4 number 1, volume 2 of the videotaped 5 deposition of Mr. Guo Wengui. 6 We are back on the record. 7 The court reporter may swear in 8 the two interpreters and the witness. 9 10 V I C T O R C H A N G, the Interpreter, was 11 duly sworn by Terri Fudens, a 12 Notary Public of the State of New 13 York, to accurately translate the 14 following questions and answers to 15 the best of his ability. 16 17 U N A W I L K I N S O N, the Interpreter, was 18 duly sworn by Terri Fudens, a 19 Notary Public of the State of New 20 York, to accurately translate the 21 following questions and answers to 22 the best of her ability. 23 G U O W E N G U I, a counterclaim defendant 24 herein, having been first duly sworn 25 by Terri Fudens, a Notary Public of</p> <p style="text-align: right;">Page 239</p>	<p>1 GUO WENGUI 2 MR. GREIM: I will stand on the 3 word recording. 4 INTERPRETER WILKINSON: Just 5 recording, not voice recording him? 6 INTERPRETER CHANG: You tell me 7 what do you mean. 8 INTERPRETER WILKINSON: You 9 could be talking about any record, 10 right, any record of communications. 11 MR. GREIM: Not record. 12 Recording. It could be voice only or 13 voice in audio. If he said voice, 14 that's fair. 15 INTERPRETER WILKINSON: Okay. 16 INTERPRETER CHANG: He said he 17 did not understand what kind of 18 agreement. He did not understand 19 what he was referring to in terms of 20 agreement. 21 Q Sir, I'm referring to the agreement 22 at issue in this case between Eastern Profit and 23 Strategic Vision. I'm asking you to go back six 24 months before the execution of that agreement. 25 That's what my question pertains to.</p> <p style="text-align: right;">Page 241</p>
<p>1 GUO WENGUI 2 the State of New York, was examined 3 and testified as follows: 4 EXAMINATION BY 5 MR. GREIM: 6 Q Mr. Guo, welcome back. I'm here to 7 question you on a few topics that have been set 8 forth in some court orders. 9 My first question for you is whether 10 you have conducted a search of certain recordings 11 of communications between yourself and the CCP or 12 PRC, and the PAP year before execution of the 13 contract in this case. 14 A No. 15 Q Do you have any such recordings? 16 A What do you mean by recording? 17 Q Recordings of communications between 18 yourself and any official of the CCP or PRC in the 19 six months prior to the negotiation of the 20 execution of the contract. 21 INTERPRETER WILKINSON: Counsel, 22 you just talking about voice 23 recording? When you talk about 24 recording, are you just talking about 25 voice recording?</p> <p style="text-align: right;">Page 240</p>	<p>1 GUO WENGUI 2 MR. HARMON: Can we define the 3 period as June through the end of the 4 year or June, 2016. 5 MR. GREIM: That's fine. We'll 6 do that. 7 MR. HARMON: Thank you. 8 Q Do you have any recordings of any 9 conversation between yourself and any member of 10 the CCP or PRC from June 1, 2017 to January 6, 11 2018? 12 A No. 13 Q Do you have recordings of a 14 conversation between yourself and Liu Yuan Ping in 15 May of 2017? 16 A No. 17 Q Did you make a recording of a 18 conversation between yourself and Liu Yuan Ping in 19 May of 2017? 20 A No, I did not. 21 Q Did you make a recording of a 22 conversation between yourself and a CCP or PRC 23 official in March of 2017? 24 A Yes. 25 Q Where is that recording now?</p> <p style="text-align: right;">Page 242</p>

3 (Pages 239 to 242)

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<p>1 GUO WENGUI</p> <p>2 A It was on the Internet.</p> <p>3 MR. GREIM: I am not sure what</p> <p>4 exhibit number we're on in this, but</p> <p>5 I think we only used a few.</p> <p>6 So I'm going to hand the witness</p> <p>7 what we're going to call and use</p> <p>8 throughout the day as Guo Exhibit 10.</p> <p>9 (Guo Exhibit 10, a black page</p> <p>10 with a label on the front which</p> <p>11 begins with Bates number SVUS 1305</p> <p>12 through SVUS 1440 marked for</p> <p>13 Identification as of this date.)</p> <p>14 MR. GREIM: Guo Exhibit 10</p> <p>15 consists of a black page and a label</p> <p>16 on the front, and it begins on Bates</p> <p>17 number SVUS 1305, just inside of that</p> <p>18 cover, and it ends on Bates number</p> <p>19 SVUS 1440. It was submitted to the</p> <p>20 court and the parties in this case</p> <p>21 some months ago.</p> <p>22 Q I would ask the witness to please</p> <p>23 turn to page 1314. It's only a few pages in.</p> <p>24 You'll see on this page continuing to</p> <p>25 page 1315, which is on the back, a transcription</p> <p style="text-align: right;">Page 243</p>	<p>1 GUO WENGUI</p> <p>2 it's authentic or not.</p> <p>3 A I want to know the source of this</p> <p>4 transcription. I don't understand English, and I</p> <p>5 don't know what the Chinese refers to either. So</p> <p>6 I want you to tell me the source of this</p> <p>7 transcription.</p> <p>8 Q That's a fair question. And the</p> <p>9 source is the website, the YouTube site that you</p> <p>10 can see at the top of page 13/14 after the words</p> <p>11 video 1.</p> <p>12 MR. HARMON: Note my objection.</p> <p>13 Problematic if the witness says that</p> <p>14 he cannot read English, and the</p> <p>15 reference that you're making is to</p> <p>16 Arabic characters.</p> <p>17 Q Here's what I will do, Mr. Guo.</p> <p>18 A Hold on. Hold on.</p> <p>19 Q Mr. Guo, I will play for you the</p> <p>20 video that is transcribed on pages 13/14 and</p> <p>21 13/15. I will ask you to listen to it and tell if</p> <p>22 you can identify this as your voice and a</p> <p>23 conversation that you had?</p> <p>24 MR. HARMON: Mr. Greim how are</p> <p>25 you identifying for the record what</p> <p style="text-align: right;">Page 245</p>
<p>1 GUO WENGUI</p> <p>2 in Mandarin and then a translation into English of</p> <p>3 a conversation between you and some other party</p> <p>4 that occurred in March and was posted on April 29,</p> <p>5 2017.</p> <p>6 MR. HARMON: Mr. Greim, you say</p> <p>7 that this is a transcript of a</p> <p>8 conversation that Mr. Guo had.</p> <p>9 How do you know that it's a</p> <p>10 conversation that Mr. Guo had?</p> <p>11 MR. GREIM: I'll represent to</p> <p>12 the witness that more than one other</p> <p>13 witness has listened to this</p> <p>14 recording and has identified the</p> <p>15 witness' voice.</p> <p>16 Q So my question to the witness is:</p> <p>17 By reading the transcript, can you</p> <p>18 identify this as the conversation you mentioned a</p> <p>19 few minutes ago?</p> <p>20 MR. HARMON: I object to the</p> <p>21 form of the question, and I object to</p> <p>22 the characterization of the exhibit</p> <p>23 without reference to the actual</p> <p>24 recording that Mr. Guo may be able to</p> <p>25 hear and determine whether or not</p> <p style="text-align: right;">Page 244</p>	<p>1 GUO WENGUI</p> <p>2 you're playing so that we all know</p> <p>3 that what he's listening to later on</p> <p>4 is something that we can identify?</p> <p>5 MR. GREIM: Thank you for that</p> <p>6 bit of housekeeping.</p> <p>7 We have referred to this video</p> <p>8 throughout the case as video 1. It</p> <p>9 has been an exhibit in other</p> <p>10 depositions. And we have a flash</p> <p>11 drive which we'll append to the</p> <p>12 record which contains Video 1 as well</p> <p>13 as a few other videos that we may</p> <p>14 play later today.</p> <p>15 INTERPRETER WILKINSON: Also</p> <p>16 that counsel have already asked a</p> <p>17 question to Mr. Guo, and counsel said</p> <p>18 to Mr. Guo that we're going to play</p> <p>19 this video for you.</p> <p>20 MR. HARMON: Since Mr. Guo is a</p> <p>21 non-party, we have not been at other</p> <p>22 depositions at which the video was</p> <p>23 played. And we have not -- do not</p> <p>24 have a copy of the flash drive.</p> <p>25 So I would ask that you agree to</p> <p style="text-align: right;">Page 246</p>

4 (Pages 243 to 246)

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<p>1 GUO WENGUI 2 provide me with a copy of the flash 3 drive so that at some point we can 4 verify or be in a position to verify 5 that the video you're playing is 6 video one on that drive. 7 Q I will now play the video. 8 MR. HARMON: Mr. Greim, will you 9 provide us with a copy of the flash 10 drive? 11 MR. GREIM: Yes. 12 (At this time the flash drive 13 was played.) 14 Q Mr. Guo, my question to you is was 15 that your voice? 16 A I would have no way to make sure. 17 MR. HARMON: I do want the 18 record to reflect that the video is 19 not a video of Mr. Guo or of any 20 person. It's a video of a voice 21 recording. 22 INTERPRETER WILKINSON: I think 23 counsel was saying that this is not a 24 video. This is just a voice 25 recording.</p> <p style="text-align: right;">Page 247</p>	<p>1 GUO WENGUI 2 These are two fraudsters. 3 Q Is the recording that we just 4 listened to the recording that you testified 5 earlier you had made with a CCP or PRC official in 6 March of 2017? 7 A Can you repeat it. 8 Q Sure. Is the recording that we just 9 listened to the recording that you testified 10 earlier that you had made in March of 2017 of a 11 conversation between you and a CCP or PRC 12 official? 13 A No. 14 Q What do you recall about the 15 recording that you made in March of 2017 of a 16 conversation between yourself and a CCP or PRC 17 official? 18 MR. HARMON: Object to the form 19 of the question. Vague and 20 ambiguous. 21 You can interpret the question, 22 my objection, and then his answer. 23 INTERPRETER WILKINSON: I 24 believe that the counsel said do you 25 recall.</p> <p style="text-align: right;">Page 249</p>
<p>1 GUO WENGUI 2 INTERPRETER CHANG: May I speak 3 now? 4 MR. HARMON: There's no question 5 pending. 6 Q My question to you is is that your 7 voice? Is the voice that we just played that was 8 recorded in video 1 your voice? 9 MR. HARMON: Asked and answered. 10 Answer again. 11 A No, because I was looking at the -- 12 INTERPRETER WILKINSON: 13 Interpret what the witness said 14 first. The witness is saying: 15 A I was watching a voice recording, not 16 a video. But I said I was looking at this one, 17 and it obviously has an image and the voice. When 18 I want to say is I have never seen this video, and 19 I have never listened to the voice. 20 This is 100 percent not in my account 21 of YouTube. I really want to find out myself 22 where he got this, and I don't have no idea. The 23 two fraudster lawyers obtained this video, and I 24 want to know where they got it, and I want to 25 appeal to the court. And this is not right.</p> <p style="text-align: right;">Page 248</p>	<p>1 GUO WENGUI 2 MR. HARMON: What do you recall? 3 INTERPRETER WILKINSON: What do 4 you recall about that recording of 5 the conversation that you have made 6 in March, 2017. 7 INTERPRETER CHANG: I have 8 trouble to stick to the word. How do 9 you recall a recording? 10 How do you know that you recall 11 a recording. You call and you made a 12 recording of what you record the 13 accountant of a recording if you -- I 14 mean to my way of interpretation, you 15 have to make sense of the question, 16 otherwise the -- 17 Q I don't understand the dispute, but I 18 will ask for the witness' question. Actually, I 19 will withdraw it and I'll ask a different 20 question. There's already a form objection 21 anyway. Let me ask a new question. 22 Who was your March of 2017 discussion 23 that you testified to earlier with? 24 A I really can't answer this question 25 because I have tens of thousands of conversations</p> <p style="text-align: right;">Page 250</p>

5 (Pages 247 to 250)

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<p>1 GUO WENGUI</p> <p>2 and recordings of which one that you want me to --</p> <p>3 INTERPRETER CHANG: He said:</p> <p>4 A I have had the conversations with the</p> <p>5 tens of thousands of people, and how would I pick</p> <p>6 one now? Which one do I remember in particular?</p> <p>7 Q Sir, I'm asking you about the</p> <p>8 conversation that you said that you had had in</p> <p>9 March of 2017 with a CCP or a PRC official and</p> <p>10 that you're recording. That's the conversation</p> <p>11 I'm asking you about.</p> <p>12 A CCP. CCP. He wanted me to spell out</p> <p>13 what is a CCP and CCI.</p> <p>14 INTERPRETER WILKINSON: PRC.</p> <p>15 A I had a conversation with a CCP</p> <p>16 official by the name of Liu Yan Ping. I had a</p> <p>17 conversation with that person, and I had a</p> <p>18 recording of that conversation.</p> <p>19 Q Was that conversation in March of</p> <p>20 2017?</p> <p>21 A Approximately, yes, that timing.</p> <p>22 Q Did you have conversations with any</p> <p>23 other CCP or PRC officials in March of 2017?</p> <p>24 A I don't really remember.</p> <p>25 Q Is the recording that we just</p> <p style="text-align: right;">Page 251</p>	<p>1 GUO WENGUI</p> <p>2 about this. Is it your testimony that the</p> <p>3 recording that we just listened to is fake?</p> <p>4 MR. HARMON: Object to the form</p> <p>5 of the question. You can translate</p> <p>6 my objection.</p> <p>7 A I want to know if this is fake or</p> <p>8 this is not fake.</p> <p>9 Q Mr. Guo, either that is your voice or</p> <p>10 it is not. My question to you, which I still</p> <p>11 don't have an answer to, is is that your voice, or</p> <p>12 do you claim it's an imposter?</p> <p>13 MR. HARMON: Object to the form</p> <p>14 of the question. Asked and answered.</p> <p>15 A That I would not know.</p> <p>16 Q Is it true that in March of 2017 you</p> <p>17 had absolute faith in General Secretary Gui?</p> <p>18 A I don't have any confidence in him.</p> <p>19 Only you may have. I want him to die fast.</p> <p>20 That's my 100 percent hatred of him.</p> <p>21 This is like you are making a naked</p> <p>22 lie. How can you live with who harmed your whole</p> <p>23 family? How can you love a leader?</p> <p>24 INTERPRETER WILKINSON: He</p> <p>25 hasn't finished.</p> <p style="text-align: right;">Page 253</p>
<p>1 GUO WENGUI</p> <p>2 listened to a discussion between you and Mr. Liu</p> <p>3 Yan Ping?</p> <p>4 A I don't know. I think I never --</p> <p>5 this is ridiculous because this is not under my</p> <p>6 YouTube account and the technical. It's so easy</p> <p>7 for anyone to make a fake conversation.</p> <p>8 I want to know where this came from</p> <p>9 and whose conversation was this with. And I want</p> <p>10 my attorney to make the effort to find out the</p> <p>11 source of whatever I listen to just now.</p> <p>12 Q First of all, what is your YouTube</p> <p>13 account?</p> <p>14 MR. HARMON: Object to the form</p> <p>15 of the question.</p> <p>16 A He said this is a fake attempt</p> <p>17 because you did not even make sure that my account</p> <p>18 is my account. I don't understand the English</p> <p>19 account as to how they are formed. I know my</p> <p>20 account have G-U-O, my last name in it. But there</p> <p>21 is none.</p> <p>22 If you didn't make the effort to make</p> <p>23 sure that is a part of the account, then how you</p> <p>24 can present this as my YouTube account?</p> <p>25 Q Mr. Guo, I want to be very clear</p> <p style="text-align: right;">Page 252</p>	<p>1 GUO WENGUI</p> <p>2 A How can you love a leader that</p> <p>3 detained 270 of your employees? How can you love</p> <p>4 a leader who put 2 million Muslims in camps? How</p> <p>5 can you have a confidence in a leader who wants to</p> <p>6 kill all Americans and how can you have confidence</p> <p>7 in such a leader. This is the just ridiculous.</p> <p>8 And maybe only the two cheaters you are</p> <p>9 representing, they might be able to love such a</p> <p>10 leader.</p> <p>11 INTERPRETER WILKINSON: He also</p> <p>12 said that how can you love such a</p> <p>13 leader that he raped Hong Kong.</p> <p>14 A In addition, how can you leave a</p> <p>15 leader who is raping Hong Kong and also Taiwan.</p> <p>16 MR. GREIM: Move to strike as</p> <p>17 nonresponsive. I have a new question</p> <p>18 for you.</p> <p>19 A I haven't finished yet. If you don't</p> <p>20 want me to say anything or if you don't want me</p> <p>21 say what I want to say, I will leave then.</p> <p>22 Q I want you to answer the question.</p> <p>23 MR. HARMON: He did answer the</p> <p>24 question.</p> <p>25 MR. GREIM: No, he didn't.</p> <p style="text-align: right;">Page 254</p>

6 (Pages 251 to 254)

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<p>1 GUO WENGUI</p> <p>2 MR. HARMON: If you have another</p> <p>3 question, ask him.</p> <p>4 MR. GREIM: I do. I do have</p> <p>5 another question. I ask the witness</p> <p>6 to answer my questions.</p> <p>7 MR. HARMON: Please don't give</p> <p>8 the witness directions. Ask the</p> <p>9 question and he will give a answer.</p> <p>10 MR. GREIM: We'll see if this</p> <p>11 works any better.</p> <p>12 MR. HARMON: You may.</p> <p>13 Q Were you beginning an operation when</p> <p>14 you returned to New York in March of 2017?</p> <p>15 MR. HARMON: Objection to the</p> <p>16 form of the question.</p> <p>17 A Before I finished my answer to your</p> <p>18 previous questions, I'm not going to answer any</p> <p>19 new questions.</p> <p>20 Q No, sir. You will answer my</p> <p>21 question.</p> <p>22 MR. HARMON: Please delete any</p> <p>23 photographs you've taken.</p> <p>24 MR. GREIM: I would ask everyone</p> <p>25 at this table: Please. No one</p> <p style="text-align: right;">Page 255</p>	<p>1 GUO WENGUI</p> <p>2 to the witness, please.</p> <p>3 MR. HARMON: Object to the form</p> <p>4 of the question.</p> <p>5 INTERPRETER WILKINSON: Counsel's</p> <p>6 question was did you just finish an</p> <p>7 operation? You just returned to New</p> <p>8 York after a operation in China in</p> <p>9 March, 2017.</p> <p>10 MR. GREIM: That was not my</p> <p>11 question. Let's start over. I</p> <p>12 disagree. That wasn't my question.</p> <p>13 INTERPRETER CHANG: After you</p> <p>14 returned to the U.S., did you start</p> <p>15 an operation in March, 2017?</p> <p>16 MR. GREIM: Correct. That is my</p> <p>17 question.</p> <p>18 INTERPRETER CHANG: My</p> <p>19 translation to him was did you start</p> <p>20 an operation in March, 2017.</p> <p>21 In Chinese it's hard for me to</p> <p>22 say what exactly the operation is. I</p> <p>23 asked him if you started doing</p> <p>24 something.</p> <p>25 MR. HARMON: Object to the form</p> <p style="text-align: right;">Page 257</p>
<p>1 GUO WENGUI</p> <p>2 should be taking photos of anyone.</p> <p>3 They should all be deleted.</p> <p>4 MS. WALLOP: They'll be deleted</p> <p>5 right now.</p> <p>6 You're not checking my phone.</p> <p>7 A I want to check. You don't check, I</p> <p>8 wouldn't give any answer.</p> <p>9 MR. HARMON: Mr. Greim, would</p> <p>10 you check and make sure that the</p> <p>11 pictures have been deleted.</p> <p>12 Off the record.</p> <p>13 (At this time, a brief recess</p> <p>14 was taken.)</p> <p>15 MR. HARMON: Get another</p> <p>16 question and an answer.</p> <p>17 The record will reflect that</p> <p>18 Mr. Guo believes that he's not being</p> <p>19 allowed to finish the answer to his</p> <p>20 last question. But let's move on.</p> <p>21 Ask another question.</p> <p>22 CONTINUED EXAMINATION</p> <p>23 BY MR. GREIM:</p> <p>24 Q My question is about the operation.</p> <p>25 MR. GREIM: Reread that question</p> <p style="text-align: right;">Page 256</p>	<p>1 GUO WENGUI</p> <p>2 of the question.</p> <p>3 A Because I really want to continue,</p> <p>4 and my answering your questions whether I had</p> <p>5 confidence in Mr. Si Jing Ping.</p> <p>6 Before that, I don't want to answer</p> <p>7 any new questions.</p> <p>8 MR. HARMON: Mr. Guo, we have</p> <p>9 made our record clear that your</p> <p>10 answer was not complete and that you</p> <p>11 have other testimony to give in</p> <p>12 response to the question.</p> <p>13 But in order to move this along,</p> <p>14 I would ask you to accept that the</p> <p>15 record is clear that your answer</p> <p>16 wasn't complete and to answer, if you</p> <p>17 can, the next question that was</p> <p>18 asked.</p> <p>19 (Question repeated)</p> <p>20 A What I want to reply to your earlier</p> <p>21 question was I could never have any confidence in</p> <p>22 Mr. Xi because he confiscated hundreds of millions</p> <p>23 of my own property.</p> <p>24 INTERPRETER WILKINSON: Tens of</p> <p>25 billions.</p> <p style="text-align: right;">Page 258</p>

7 (Pages 255 to 258)

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<p>1 GUO WENGUI</p> <p>2 A Hundreds of millions, not billions.</p> <p>3 INTERPRETER WILKINSON: Tens of</p> <p>4 billions.</p> <p>5 A Tens of billions, my personal</p> <p>6 property. My family property. He detained 270</p> <p>7 employees of mine, and also my family members.</p> <p>8 How could I have confidence in such a person or</p> <p>9 leader.</p> <p>10 INTERPRETER WILKINSON: He is my</p> <p>11 biggest enemy, and I am the number 1</p> <p>12 entity.</p> <p>13 MR. HARMON: Can you answer the</p> <p>14 next question he asked.</p> <p>15 (Interpreter complying)</p> <p>16 A Because the English and Chinese</p> <p>17 has -- have a gap between an operation, because he</p> <p>18 said I told him I don't have an exact chinese word</p> <p>19 for the English word operation. So he is asking</p> <p>20 what do you mean? I cannot understand this. What</p> <p>21 do you mean? I started what?</p> <p>22 Q How about project?</p> <p>23 INTERPRETER CHANG: He said the</p> <p>24 word project is even more ambiguous</p> <p>25 because you know in Chinese if you go</p> <p style="text-align: right;">Page 259</p>	<p>1 GUO WENGUI</p> <p>2 interpret everything that counsel is</p> <p>3 saying.</p> <p>4 A I said no. Absolutely never.</p> <p>5 Q Did you say that people who attack</p> <p>6 our CCP leaders are modern traders of the Chinese</p> <p>7 nation and must be punished?</p> <p>8 A Total garbage. Never said anything</p> <p>9 like that.</p> <p>10 Q What did you talk with Liu Yuan Ping</p> <p>11 about in March of 2017?</p> <p>12 A You have to specify what I said</p> <p>13 because I had conversation with Mr. Liu for over</p> <p>14 100 hours. This is the representative of the</p> <p>15 government that he sent the guy called the Wu</p> <p>16 Zheng.</p> <p>17 INTERPRETER CHANG: I don't know</p> <p>18 exactly the spelling.</p> <p>19 A This is the official -- the whole</p> <p>20 standard of this guy to announce to me they are</p> <p>21 confiscating my family property. They are</p> <p>22 detaining my wife and my daughter, my brothers and</p> <p>23 my company employees. I have not finished.</p> <p>24 He told me that we have the deeper</p> <p>25 power forces in the United States, that they can</p> <p style="text-align: right;">Page 261</p>
<p>1 GUO WENGUI</p> <p>2 cook a dish, that's a project. If</p> <p>3 you take a bathroom break, that's a</p> <p>4 project. If you believing in these</p> <p>5 two cheaters, that's a project also.</p> <p>6 So what do you mean by a project?</p> <p>7 Q Mr. Guo, did you tell anyone in March</p> <p>8 of 2017 that critics of the Chinese government</p> <p>9 deserved to die?</p> <p>10 A Never. I never said that. All those</p> <p>11 the opposing communist party. The party members,</p> <p>12 they should go to hell.</p> <p>13 Q My question is whether you told</p> <p>14 anyone this in March of 2017, not about your</p> <p>15 opinion today?</p> <p>16 MR. HARMON: He said no. He</p> <p>17 answered the question. You can ask</p> <p>18 it again, but he answered the</p> <p>19 question.</p> <p>20 MR. GREIM: No. No.</p> <p>21 INTERPRETER WILKINSON: The</p> <p>22 interpreter should interpret what the</p> <p>23 counsel said and also this counsel</p> <p>24 said; right?</p> <p>25 MR. HARMON: Yes. You should</p> <p style="text-align: right;">Page 260</p>	<p>1 GUO WENGUI</p> <p>2 make -- destroy me personally and the reputation.</p> <p>3 INTERPRETER WILKINSON: The</p> <p>4 witness also said that they have --</p> <p>5 they have control media in the U.S.</p> <p>6 INTERPRETER CHANG: Yes.</p> <p>7 INTERPRETER WILKINSON: And a</p> <p>8 site called Bo Xun, I believe, and</p> <p>9 also someone named Meng Wei Ceng.</p> <p>10 M-E-N-G, W-E-I, C-E-N-G. These are</p> <p>11 the people that can help.</p> <p>12 CONTINUED EXAMINATION</p> <p>13 BY MR. GREIM:</p> <p>14 A Liu Yuan Ping told me that the reason</p> <p>15 that person, I spell his name for you a little</p> <p>16 earlier, that he is in charge of the overseas</p> <p>17 information network, and he warned me not to talk</p> <p>18 about anything about Hong Kong and Taiwan and</p> <p>19 Shin Yang. (Phonetic)</p> <p>20 If I ever do these things they don't</p> <p>21 want me to do, they will kill me, and they won't</p> <p>22 even -- nobody can find where I was killed or</p> <p>23 where the body would be.</p> <p>24 He also warned me never to get in</p> <p>25 touch with FBI, CIA to talk about what they</p> <p style="text-align: right;">Page 262</p>

8 (Pages 259 to 262)

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<p>1 GUO WENGUI 2 committed in China or that I will be killed, and 3 then nobody can even find my body. 4 While he had that conversation with 5 me he detained my family members, including my 6 brother. What is more important and more serious 7 is that within that 100 hours of conversation 8 Mr. Liu had with me, he detained my employees and 9 my family members and abused them in detention. 10 Some of them had their legs broken. 11 Q When did the 100 hours of discussion 12 take place? 13 A Can you hold off your question. I 14 haven't finished to answer your question yet. 15 What I want to tell you is in that 16 nearly 100 hours of conversation I had with 17 Mr. Liu, he threatened me with killing me, and he 18 told me names of FBI and CIA agents. 19 And how can I have confidence that 20 this government that want you to kill me and want 21 to destroy me and erase me from the face of the 22 earth. 23 I haven't finished yet. 24 Q I'm going to stop because we're 25 getting a long narrative response.</p> <p style="text-align: right;">Page 263</p>	<p>1 GUO WENGUI 2 translated to the witness.) 3 A I want to continue my answer to your 4 question because in one of the conversations told 5 me that do you know how many of those people who 6 were -- died in car accidents or drawn in the sea. 7 How did that happen? Do you want to know? 8 Q Let me do this, Mr. Guo. I wanted 9 the general subject matter of your discussion. It 10 wasn't obvious what you were doing until I got the 11 second set of translations back. So we are going 12 to go through your discussions. 13 First I want to understand the basics 14 of this, and then we will go through in an orderly 15 fashion. My next question to you is -- go ahead. 16 (Interpreter complying) 17 INTERPRETER CHANG: He said why 18 did you interrupt me because you 19 asked the question about this over 20 100 hours of conversation. I haven't 21 told you that even using five minutes 22 of my time to tell you. Why did you 23 not want to listen to what I'm 24 telling you. 25 Q No. No. Stop. Stop. Stop, please.</p> <p style="text-align: right;">Page 265</p>
<p>1 GUO WENGUI 2 MR. HARMON: That's what you 3 asked for. That is what you asked 4 for. 5 MR. GREIM: No. 6 MR. HARMON: I object to you 7 cutting off the witness. 8 MR. GREIM: The witness is 9 filibustering at this point. 10 MR. HARMON: The witness is not 11 filibustering. You asked him a wide 12 open question about his conversations 13 which he said lasted over hundreds of 14 hours. 15 MR. GREIM: No. 16 MR. HARMON: Now you don't want 17 to hear about my conversations. I 18 object. If you're not going to let 19 the witness answer the questions, 20 then don't ask questions. 21 MR. GREIM: We're getting a 22 filibusters, is what we're getting. 23 You can go ahead and translate 24 that to the witness. 25 (At this time the interpreter</p> <p style="text-align: right;">Page 264</p>	<p>1 GUO WENGUI 2 I tried to ask a question. The witness is just 3 commandeering the transcript. Let's stop. 4 MR. HARMON: That is a false 5 statement. That's a false statement. 6 You asked a wide open question about 7 hundreds of hours of conversations, 8 and now you don't want to hear the 9 details of it. 10 Q I asked a question. 11 MR. HARMON: I object to your 12 characterization. I object to you 13 cutting off the witness, but I want 14 to move along. 15 So if you have a narrow, ask the 16 narrow question. But if your next 17 question is a wide open question, 18 then you're going to have to sit here 19 and listen to a wide open answer. 20 Q My next question is when did you have 21 your more than 100 hours of discussions with 22 Mr. Liu Yuan Ping? 23 INTERPRETER CHANG: Can you 24 repeat it. 25 (The requested portion of the</p> <p style="text-align: right;">Page 266</p>

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<p>1 GUO WENGUI</p> <p>2 record was read back by the</p> <p>3 interpreter.)</p> <p>4 Q When did you have your more than 100</p> <p>5 hours of discussion with Mr. Liu Yuan Ping?</p> <p>6 A You already asked. That's between</p> <p>7 April -- March and April of 2017.</p> <p>8 Q Were these discussions over the phone</p> <p>9 or in person?</p> <p>10 A This is a waste of your time. He was</p> <p>11 in China and I was in the U.S. Of course that's</p> <p>12 over the phone. This is not really a Q and A.</p> <p>13 This is like a waste of my time.</p> <p>14 Q Did you make any recordings of those</p> <p>15 discussions?</p> <p>16 A A small portion of the conversation I</p> <p>17 did make the recording.</p> <p>18 Q How?</p> <p>19 A I used my cell phone to make a</p> <p>20 recording.</p> <p>21 Q What phone number did you use?</p> <p>22 A There may be hundreds of phones that</p> <p>23 he asked me to change a new phone every time. So</p> <p>24 after I used it, I threw it away.</p> <p>25 Q Did you speak with any other CCP or</p> <p style="text-align: right;">Page 267</p>	<p>1 GUO WENGUI</p> <p>2 Q Did you talk with some of them more</p> <p>3 than others?</p> <p>4 MR. HARMON: Objection to the</p> <p>5 form.</p> <p>6 A That I don't remember. I don't have</p> <p>7 an accurate measure.</p> <p>8 Q Did you speak over the phone with any</p> <p>9 PRC or CCP officials in May or June of 2017?</p> <p>10 A None after June.</p> <p>11 Q Okay. But my question is about the</p> <p>12 months of May and June.</p> <p>13 A I don't remember clearly exactly.</p> <p>14 Q Did you speak with Sun Li Gun</p> <p>15 (phonetic) over the phone when he was visiting</p> <p>16 Washington, D.C.?</p> <p>17 MR. HARMON: Object to the form</p> <p>18 of the question.</p> <p>19 A Yes.</p> <p>20 Q In what month was that?</p> <p>21 A Between May and June.</p> <p>22 Q Did you meet in person with Sun Li</p> <p>23 Gun?</p> <p>24 A No.</p> <p>25 Q Did you meet in person with any CCP</p> <p style="text-align: right;">Page 269</p>
<p>1 GUO WENGUI</p> <p>2 PRC officials during this March through April</p> <p>3 timeframe?</p> <p>4 A Do you want me to spend a lot of time</p> <p>5 to clarify my answers? It will take a long time.</p> <p>6 Q I want the names of any other</p> <p>7 officials -- actually the first question is a yes</p> <p>8 or no question.</p> <p>9 Did you speak with any other CCP or</p> <p>10 PRC officials between March and April of 2017?</p> <p>11 A Yes.</p> <p>12 Q Who?</p> <p>13 A Do you want me to tell every name?</p> <p>14 Q Yes.</p> <p>15 A But the condition is you cannot</p> <p>16 interrupt me. If you want me to tell you every</p> <p>17 name, you should not interrupt me. If you just</p> <p>18 want me to give you one or two names, that's a</p> <p>19 different story.</p> <p>20 Q Let me ask you this. Did you talk to</p> <p>21 more than 10 CCP or PRC officials between March</p> <p>22 and April, 2017?</p> <p>23 A Yes.</p> <p>24 Q More than 20?</p> <p>25 A Yes.</p> <p style="text-align: right;">Page 268</p>	<p>1 GUO WENGUI</p> <p>2 or PRC officials between March and April of 2017?</p> <p>3 A No.</p> <p>4 Q Did you meet with Li Yan Ping pinning</p> <p>5 in the UK before his trip to the United States?</p> <p>6 MR. HARMON: Object to the form</p> <p>7 of the question.</p> <p>8 A No.</p> <p>9 Q Which Chinese officials did you meet</p> <p>10 with in person in May and June of 2017?</p> <p>11 MR. HARMON: Object to the form</p> <p>12 of the question.</p> <p>13 A I met with lieu Yang pinning and the</p> <p>14 three of his in his entourage and they attempted</p> <p>15 to kidnap me is that the FBI detained them at the</p> <p>16 airport.</p> <p>17 Q Are there any recordings of your</p> <p>18 discussions with lieu Yang pinning?</p> <p>19 A No.</p> <p>20 INTERPRETER CHANG: He is asking</p> <p>21 if this is a voice recording. I said</p> <p>22 yes, a voice recording. He's</p> <p>23 clarifying in Chinese video recording</p> <p>24 and the voice recording are two very</p> <p>25 different terms.</p> <p style="text-align: right;">Page 270</p>

10 (Pages 267 to 270)

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<p>1 GUO WENGUI</p> <p>2 Q Did you make any video recordings of</p> <p>3 your meeting with Liu Yuan Ping and his entourage?</p> <p>4 A Yes.</p> <p>5 Q How many hours?</p> <p>6 A I don't recall.</p> <p>7 Q Where are the video recordings?</p> <p>8 MR. HARMON: Object to the form</p> <p>9 of the question.</p> <p>10 A What he said, I don't remember.</p> <p>11 Q Did you use microphones to make any</p> <p>12 voice recordings of your meetings with Liu Yuan</p> <p>13 Ping and his entourage?</p> <p>14 A No.</p> <p>15 Q Did you share any video or voice</p> <p>16 recordings of your meetings with Liu Yuan Ping and</p> <p>17 his entourage with any media?</p> <p>18 MR. HARMON: Object to the form</p> <p>19 of the question.</p> <p>20 A During an interview with the VOA I</p> <p>21 shared with them a clip of a video, the voice of</p> <p>22 America.</p> <p>23 Q Who was on that video?</p> <p>24 A Liu Yuan Ping and his three people</p> <p>25 with him, and myself also. I corrected what I</p> <p style="text-align: right;">Page 271</p>	<p>1 GUO WENGUI</p> <p>2 of the question.</p> <p>3 A After my interview with the Wall</p> <p>4 Street Journal.</p> <p>5 INTERPRETER WILKINSON: Do you</p> <p>6 know the check interpreter raised a</p> <p>7 point that when the witness is asking</p> <p>8 a question about the -- your</p> <p>9 counsel's question asked, can the</p> <p>10 interpreter repeat, interpret what</p> <p>11 the witness asked in English instead</p> <p>12 of answering it even though maybe he</p> <p>13 knows the answer that is just to</p> <p>14 repeat your question. But can</p> <p>15 just -- can he just interpret what</p> <p>16 the witness said in English to you?</p> <p>17 Is this possible?</p> <p>18 INTERPRETER CHANG: I'm trying</p> <p>19 to catch what you were saying.</p> <p>20 MR. GREIM: I understand the</p> <p>21 question. Basically I don't want to</p> <p>22 do that, or we will never get</p> <p>23 anything done. I am willing to allow</p> <p>24 you and the main interpreter to speak</p> <p>25 in Chinese with the witness to</p> <p style="text-align: right;">Page 273</p>
<p>1 GUO WENGUI</p> <p>2 said. It's not was VOA. It was MIN G. JING.</p> <p>3 That is the media in the organization. I shared</p> <p>4 that video with that media organization.</p> <p>5 Q Did you share the video or any voice</p> <p>6 recording with the Wall Street Journal?</p> <p>7 A Yes, I shared with the Wall Street</p> <p>8 Journal a video.</p> <p>9 Q What equipment did you use to record</p> <p>10 the meetings?</p> <p>11 A I don't remember.</p> <p>12 Q Who assisted you in making the</p> <p>13 recordings?</p> <p>14 MR. HARMON: Object to the form</p> <p>15 of the question.</p> <p>16 A My answer is I don't exactly recall</p> <p>17 which company assisted me.</p> <p>18 Q Is it your testimony that the</p> <p>19 recordings no longer exist?</p> <p>20 MR. HARMON: Object to the form</p> <p>21 of the question, and also asked and</p> <p>22 answered.</p> <p>23 A No. I cannot be certain about that.</p> <p>24 Q When did you last see the videos?</p> <p>25 MR. HARMON: Object to the form</p> <p style="text-align: right;">Page 272</p>	<p>1 GUO WENGUI</p> <p>2 clarify what my question is, but I</p> <p>3 don't want to have that entire</p> <p>4 discussion translated back in</p> <p>5 English, or we'll have translations</p> <p>6 within translations?</p> <p>7 INTERPRETER WILKINSON: No. No.</p> <p>8 No. It's just that the witness is</p> <p>9 asking.</p> <p>10 MR. HARMON: Time out. Let's do</p> <p>11 it. The interpreter is going to</p> <p>12 interpret. If you believe that</p> <p>13 something that's being said in</p> <p>14 Chinese needs to be on the record in</p> <p>15 order to provide clarity, let us</p> <p>16 know. Otherwise, let's move on.</p> <p>17 MR. GREIM: Thank you,</p> <p>18 Mr. Harmon. I agree with that.</p> <p>19 Q Now have you posted any of the audio</p> <p>20 recordings or any voice element of the audio</p> <p>21 recordings on the Internet?</p> <p>22 MR. HARMON: Object to the form</p> <p>23 of the question.</p> <p>24 A Yes, I posted every recording, video</p> <p>25 or audio, I have on the Internet recording I had</p> <p style="text-align: right;">Page 274</p>

11 (Pages 271 to 274)

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<p>1 GUO WENGUI</p> <p>2 with the CCP on the Internet.</p> <p>3 This is a total crazy because two</p> <p>4 people who are paying you and they are they spies</p> <p>5 of communist party. Have you ever seen a spy who</p> <p>6 would post their conversations on the Internet?</p> <p>7 And I posted everything I had at the wisdom on the</p> <p>8 Internet. How could they accuse me of being spy?</p> <p>9 Your fee is paid by a third party,</p> <p>10 but why can't you publicize the source of your</p> <p>11 fees on the Internet?</p> <p>12 MR. GREIM: Okay. I move to</p> <p>13 strike all this as non-responsive.</p> <p>14 We're no longer answering any</p> <p>15 questions that I've asked. We're</p> <p>16 going to move on.</p> <p>17 Q What happened to the video or audio</p> <p>18 recordings that you had made of your meetings with</p> <p>19 Liu Yuan Ping?</p> <p>20 A I don't know.</p> <p>21 Q What happened to the cell phone</p> <p>22 recordings that you made of your phone discussions</p> <p>23 with Liu Yuan Ping?</p> <p>24 A I don't know.</p> <p>25 Q Where were you storing the video or</p> <p style="text-align: right;">Page 275</p>	<p>1 GUO WENGUI</p> <p>2 THE VIDEOGRAPHER: The time is</p> <p>3 12:29 p.m. on Wednesday, December</p> <p>4 4th.</p> <p>5 This is the end of media number</p> <p>6 1, volume 2 of the videotaped</p> <p>7 deposition of Mr. Guo Wengui.</p> <p>8 Off the record.</p> <p>9 (At this time, a brief recess</p> <p>10 was taken.)</p> <p>11 THE VIDEOGRAPHER: The time is</p> <p>12 12:40 p.m., Wednesday, December 4,</p> <p>13 2019. This is media number 2, volume</p> <p>14 2 of the videotaped deposition of</p> <p>15 Mr. Guo.</p> <p>16 We are back on the record.</p> <p>17 CONTINUED EXAMINATION</p> <p>18 BY MR. GREIM:</p> <p>19 Q Mr. Guo, are you aware of any</p> <p>20 recordings of your discussions with CCP or PRC</p> <p>21 officials that were made without your consent?</p> <p>22 MR. HARMON: Object to the form</p> <p>23 of the question.</p> <p>24 A I don't know.</p> <p>25 Q Are you aware of any discussions that</p> <p style="text-align: right;">Page 277</p>
<p>1 GUO WENGUI</p> <p>2 audio recordings of your in-person discussions</p> <p>3 with Liu Yuan Ping or your phone discussions with</p> <p>4 Liu Yuan Ping?</p> <p>5 MR. HARMON: Object to the form</p> <p>6 of the question.</p> <p>7 A I really don't know.</p> <p>8 Q Did you post any of the 100 hours of</p> <p>9 phone discussions with Liu Yuan Ping on the</p> <p>10 Internet?</p> <p>11 MR. HARMON: Object to the form</p> <p>12 of the question.</p> <p>13 A This is not accurate. This is like</p> <p>14 the fakery. I never said I made a recording of</p> <p>15 100 or over 100 hours of conversations. I only</p> <p>16 said I have a small portion of the conversations</p> <p>17 and recordings.</p> <p>18 Q Did you ever post any of the</p> <p>19 recordings you made of the phone conversations</p> <p>20 with Liu Yuan Ping?</p> <p>21 A I already answered the question. I</p> <p>22 posted all the recordings of what I made of</p> <p>23 conversations on the Internet.</p> <p>24 MR. GREIM: Let's go ahead and</p> <p>25 take our first break.</p> <p style="text-align: right;">Page 276</p>	<p>1 GUO WENGUI</p> <p>2 have taken place in your apartment that have been</p> <p>3 placed on the Internet without your consent?</p> <p>4 MR. HARMON: So Mr. Greim,</p> <p>5 unless you narrow the subject matter,</p> <p>6 that question is beyond the scope of</p> <p>7 what the court allowed you to ask.</p> <p>8 MR. GREIM: Okay.</p> <p>9 Q Are you aware of any recordings of a</p> <p>10 conversation between you and any CCP or PRC</p> <p>11 official that has been placed on the Internet</p> <p>12 without your consent?</p> <p>13 A Too many. Every of that is not true.</p> <p>14 It's a fake.</p> <p>15 Q I'm sorry. I want to make sure I</p> <p>16 understand.</p> <p>17 Is it your testimony that there are</p> <p>18 fake discussions between you and CCP or PRC</p> <p>19 officials on the Internet?</p> <p>20 MR. HARMON: Object to the form</p> <p>21 of the question.</p> <p>22 A Many of those postings were fake.</p> <p>23 INTERPRETER WILKINSON: The</p> <p>24 witness also said I don't know where</p> <p>25 they are from.</p> <p style="text-align: right;">Page 278</p>

12 (Pages 275 to 278)

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<p>1 GUO WENGUI</p> <p>2 INTERPRETER CHANG: I don't</p> <p>3 think so. You can ask him to repeat</p> <p>4 it.</p> <p>5 MR. HARMON: Next question. The</p> <p>6 substance is the same.</p> <p>7 Q I'm going to know play for you, sir,</p> <p>8 what we have previously distributed as video 8.</p> <p>9 This again will be on a flash drive, and it is a</p> <p>10 voice recording, even though you'll see that it's</p> <p>11 on YouTube so you will see that there are pictures</p> <p>12 here. What I'm playing for you and asking you</p> <p>13 about is the voice recording itself.</p> <p>14 MR. HARMON: Mr. Greim, are you</p> <p>15 planning on playing the entire type?</p> <p>16 MR. GREIM: No. We won't finish</p> <p>17 if we try to go through all of these.</p> <p>18 MR. HARMON: That's what I'm</p> <p>19 asking.</p> <p>20 MR. GREIM: I'm going to play</p> <p>21 the first two minutes of a 23-minute</p> <p>22 video, and then I will stop in</p> <p>23 between on the transcript if you're</p> <p>24 following along on page 1363. I'll</p> <p>25 stop after Mr. Wengui's comments</p> <p style="text-align: right;">Page 279</p>	<p>1 GUO WENGUI</p> <p>2 Q Were any members of your family</p> <p>3 present in your apartment during this meeting?</p> <p>4 A No.</p> <p>5 Q Did meet with Mr. Liu for more than</p> <p>6 one day in your apartment?</p> <p>7 MR. HARMON: Object to the form</p> <p>8 of the question.</p> <p>9 A Yes.</p> <p>10 Q On how many days did you meet him?</p> <p>11 A Three times within three days.</p> <p>12 Q Was your family present for at least</p> <p>13 one of those meetings?</p> <p>14 MR. HARMON: Object to the form</p> <p>15 of the question.</p> <p>16 A I have no way to answer his question.</p> <p>17 Q I'm sorry. Is your testimony that</p> <p>18 you cannot remember or that they were not there?</p> <p>19 MR. HARMON: Object to the form</p> <p>20 of the question.</p> <p>21 A I don't remember.</p> <p>22 Q Did Mr. Liu offer to allow you to</p> <p>23 keep some of your mainland assets?</p> <p>24 A No.</p> <p>25 Q Did Mr. Liu praise you for the</p> <p style="text-align: right;">Page 281</p>
<p>1 GUO WENGUI</p> <p>2 right before minute 2.</p> <p>3 MR. HARMON: Before you ask a</p> <p>4 question, Mr. Greim, the video that</p> <p>5 you're playing has static pictures.</p> <p>6 It's static pictures and a voice</p> <p>7 recording.</p> <p>8 Q So my question is from the excerpt</p> <p>9 that you heard so far, is this a voice recording</p> <p>10 of a meeting between you and Liu Yuan Ping?</p> <p>11 A Yes.</p> <p>12 Q And is this a recording that you</p> <p>13 made?</p> <p>14 A Yes.</p> <p>15 Q Is this a recording, at least the</p> <p>16 section that you've listened to, a recording that</p> <p>17 you placed on the Internet?</p> <p>18 A Yes.</p> <p>19 Q Did the meeting take place at your</p> <p>20 apartment?</p> <p>21 A I don't remember.</p> <p>22 Q Do you remember meeting with Mr. Liu</p> <p>23 anywhere other than your apartment in New York</p> <p>24 City in May of 2017?</p> <p>25 A No.</p> <p style="text-align: right;">Page 280</p>	<p>1 GUO WENGUI</p> <p>2 contributions you had made to your country?</p> <p>3 A I don't remember he said that.</p> <p>4 Q Have you discussed with Mr. Liu that</p> <p>5 you have made contributions to your country in the</p> <p>6 past?</p> <p>7 MR. HARMON: Object to the form</p> <p>8 of the question.</p> <p>9 A No.</p> <p>10 Q Did you discuss with Mr. Liu the</p> <p>11 charges that have been brought against you in</p> <p>12 China?</p> <p>13 MR. HARMON: Object to the form</p> <p>14 of the question.</p> <p>15 A I don't recall.</p> <p>16 Q Do you remember on which of the three</p> <p>17 days the recording we just listened to was made?</p> <p>18 A This has nothing to do with that</p> <p>19 particular date. This conversation was happened</p> <p>20 during March.</p> <p>21 Q So Mr. Guo, is it your testimony that</p> <p>22 Mr. Liu was present to talk with you in March?</p> <p>23 MR. HARMON: Object to the form</p> <p>24 of the question.</p> <p>25 A I repeated that he only met me during</p> <p style="text-align: right;">Page 282</p>

13 (Pages 279 to 282)

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<p>1 GUO WENGUI</p> <p>2 May, so don't lie about any other time.</p> <p>3 Q I'm sorry then. Is it your testimony</p> <p>4 that the recording we just listened to is a phone</p> <p>5 recording?</p> <p>6 A Yes.</p> <p>7 Q So did you agree with Mr. Liu not to</p> <p>8 talk about your allegations regarding the CCP in</p> <p>9 public?</p> <p>10 A No.</p> <p>11 Q Mr. Guo, I'm now going to play for</p> <p>12 you a section of the recording that starts at</p> <p>13 20:30 and goes to 21:30.</p> <p>14 If you're following along on your</p> <p>15 transcript, that's page 1374 to 1375.</p> <p>16 (At this time a recording was</p> <p>17 played.)</p> <p>18 Q Okay. I stopped actually at 21:33,</p> <p>19 for the record.</p> <p>20 MR. HARMON: Where did you stop?</p> <p>21 MR. GREIM: 21:33.</p> <p>22 Q Mr. Guo, did you hear other voices in</p> <p>23 the background of this recording?</p> <p>24 A Yes, I heard.</p> <p>25 Q Did you hear a metallic sound like</p> <p style="text-align: right;">Page 283</p>	<p>1 GUO WENGUI</p> <p>2 entire thing. So I'm going to play for you the</p> <p>3 first of three minutes of this recording, sir.</p> <p>4 For the record, once again, this is</p> <p>5 a -- from YouTube, and it has two still images on</p> <p>6 a background of a world map. And the Chinese</p> <p>7 being spoken is transcribed on the video both in</p> <p>8 Chinese and in English. But the transcription</p> <p>9 that I have given out is from a certified</p> <p>10 translation done in this case.</p> <p>11 MR. HARMON: Does the certified</p> <p>12 translation differ from what's on the</p> <p>13 screen?</p> <p>14 MR. GREIM: It absolutely does</p> <p>15 in the English translation.</p> <p>16 Absolutely.</p> <p>17 INTERPRETER WILKINSON: Also</p> <p>18 that the counsel said the</p> <p>19 translation -- the certified</p> <p>20 translation, is that different from</p> <p>21 the transcription on the screen.</p> <p>22 Yes, it is very different in English.</p> <p>23 MR. GREIM: I did not say it is</p> <p>24 very different. I said it's</p> <p>25 absolutely different.</p> <p style="text-align: right;">Page 285</p>
<p>1 GUO WENGUI</p> <p>2 silverware?</p> <p>3 A Yes.</p> <p>4 Q Did you also hear Mr. Liu say that --</p> <p>5 indicate that you had brought a recording device?</p> <p>6 MR. HARMON: Objection to the</p> <p>7 form of the question.</p> <p>8 A I don't remember.</p> <p>9 Q My question is about the clip we just</p> <p>10 heard. Let me be clear. Did you hear Mr. Liu</p> <p>11 indicate that you had brought a recording device?</p> <p>12 A No.</p> <p>13 Q Did you say that, in fact, to</p> <p>14 Mr. Liu?</p> <p>15 MR. HARMON: Object to the form</p> <p>16 of the question.</p> <p>17 A I don't recall.</p> <p>18 Q Does listening to this part of the</p> <p>19 clip indicate to you that, in fact, this is a</p> <p>20 recording of an in-person meeting that you had</p> <p>21 with Mr. Liu?</p> <p>22 A I really don't recall.</p> <p>23 Q I'm now going to play what we have</p> <p>24 marked as video 9. This is an especially long</p> <p>25 recording. So once again, I will not play the</p> <p style="text-align: right;">Page 284</p>	<p>1 GUO WENGUI</p> <p>2 Q By the way, I did not intend to say</p> <p>3 they are greatly different, but they are each in</p> <p>4 English translation from Chinese, and so they are</p> <p>5 definitely different. They are not identical.</p> <p>6 I will now play the tape.</p> <p>7 (At this time, the tape was played.)</p> <p>8 Q I stopped at 3:03.</p> <p>9 Mr. Guo, do you recognize this as a</p> <p>10 recording of a meeting that you had with Mr. Liu</p> <p>11 Yuan Ping?</p> <p>12 MR. HARMON: Object to the form</p> <p>13 of the question.</p> <p>14 A Yes.</p> <p>15 Q And would this have taken place in</p> <p>16 your apartment?</p> <p>17 A Yes.</p> <p>18 Q And should there be a video component</p> <p>19 to this recording?</p> <p>20 MR. HARMON: Object to the form</p> <p>21 of the question.</p> <p>22 A It should be a part of a video, that</p> <p>23 recording.</p> <p>24 Q And in the video recording were both</p> <p>25 you and Mr. Liu shown on the screen together at</p> <p style="text-align: right;">Page 286</p>

14 (Pages 283 to 286)

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<p>1 GUO WENGUI 2 the same time? 3 MR. HARMON: Object to the form 4 of the question. 5 A I don't recall. 6 Q I will represent to you that this 7 particular clip lasts for one hour, 19 minutes and 8 29 seconds. 9 My question to you is did you have 10 discussions with Mr. Liu on the same day before 11 the beginning of the clip that we just heard? 12 A I told you earlier between March and 13 April, for over 100 hours of conversation I had 14 with them it was the detention of my family 15 members and threats against my wife and my 16 daughter. 17 INTERPRETER WILKINSON: And my 18 brother. 19 Q Say that again. 20 A And my brother. 21 Q My question is about this day. My 22 question is: Did you have discussions with 23 Mr. Liu on the same day before the beginning of 24 the recording that I played for you here? 25 A I don't recall.</p> <p style="text-align: right;">Page 287</p>	<p>1 GUO WENGUI 2 that you heard this recording? 3 A I don't remember. 4 Q Do you recall having a meeting around 5 this same time with a Mr. Kowel? (Phonetic) 6 A I don't remember. 7 Q Do you know who Mr. Kowel is? 8 A I don't know. 9 Q Do you know who Kowel Guiang Bal 10 (Phonetic) is? 11 A No. I don't know this person. 12 Q Did you tell Mr. Liu that Mr. Kowel 13 is an old comrade in the Ministry of State 14 Security? 15 A I don't remember saying that. 16 Q Did you speak with any officials in 17 China at the same time that Mr. Liu was visiting 18 you? 19 A Yes. 20 Q Who? 21 A Many of them, or quite a few of them. 22 Q To be very clear, my question is 23 limited to the time when Mr. Liu was visiting you 24 in New York. I would like you to tell me the 25 names of the officials what you spoke with over</p> <p style="text-align: right;">Page 289</p>
<p>1 GUO WENGUI 2 Q Let me ask you this. Which of the 3 three days was this recording made? 4 A It's very clear that in the 5 transcription it's on the 24th. 6 Q Do you recall whether that was the 7 first, second or third day of your meetings with 8 Mr. Liu? 9 A I don't recall. 10 Q Did Mr. Liu go to Washington, D.C. 11 after meeting with you in New York? 12 MR. HARMON: Object to the form 13 of the question. 14 A Yes. 15 Q Did he come back to meet with you 16 again after he was done with his meetings in 17 Washington? 18 A Yes. 19 Q Did you record any of your meetings 20 with him upon his return from Washington? 21 A I don't remember. 22 Q Did you make any effort to search for 23 these recordings before your deposition today? 24 A No. 25 Q When was the last time before today</p> <p style="text-align: right;">Page 288</p>	<p>1 GUO WENGUI 2 the phone during the time Mr. Liu was visiting you 3 in New York. 4 MR. HARMON: Object to the form 5 of the question. 6 A I don't quite remember the details. 7 Q Was one of the officials Wang Ti 8 Shan? 9 A He's an arch enemy. I'm very strange 10 about you mentioning this person. I would like to 11 just yell at him if I can see him. 12 Q What phone did you use to confer with 13 these Chinese officials during the time of 14 Mr. Li's visit? 15 A I don't remember. 16 Q What about secretary Meng? 17 (Phonetic) 18 MR. HARMON: Object to the form 19 of the question. Are you asking 20 whether he spoke with him during that 21 time? 22 Q Did you speak with secretary Meng 23 over the phone? 24 MR. HARMON: Ever? 25 A The Meng, there are millions of</p> <p style="text-align: right;">Page 290</p>

15 (Pages 287 to 290)

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<p>1 GUO WENGUI</p> <p>2 people with this last name. So which one? That's</p> <p>3 crazy.</p> <p>4 Q Secretary Meng Gion Ju. My question</p> <p>5 is limited to the time when Mr. Liu was visiting</p> <p>6 you.</p> <p>7 MR. HARMON: Object to the form</p> <p>8 of the question.</p> <p>9 A How could this person talk with me on</p> <p>10 the phone? He was one of my arch enemies. This</p> <p>11 person detains and threatens my family members.</p> <p>12 How could I talk with this person on the phone?</p> <p>13 INTERPRETER WILKINSON: And</p> <p>14 employees.</p> <p>15 INTERPRETER CHANG: And</p> <p>16 employees. I didn't register the</p> <p>17 employees thing.</p> <p>18 Q How many different Chinese officials</p> <p>19 did you speak with over the phone while Mr. Liu</p> <p>20 was visiting you?</p> <p>21 MR. HARMON: Objection to the</p> <p>22 form of the question.</p> <p>23 A I don't remember.</p> <p>24 Q Did you negotiate with Mr. Liu for</p> <p>25 the ability of Guo Mei, and Guo Chian, and Wa</p> <p style="text-align: right;">Page 291</p>	<p>1 GUO WENGUI</p> <p>2 half years ago you had met with the CIA in Miami</p> <p>3 and had rejected them and declined to talk to</p> <p>4 them?</p> <p>5 A I don't remember.</p> <p>6 Q Did you promise Mr. Liu that you</p> <p>7 would stop talking about secretaries Wang and</p> <p>8 Meng?</p> <p>9 A I don't remember.</p> <p>10 Q Did you promise Mr. Liu that before</p> <p>11 holding a conference on President Gi's</p> <p>12 anticorruption campaign, you would confer with</p> <p>13 Mr. Liu first about the content?</p> <p>14 A That's something sounds very</p> <p>15 ridiculous to me, but I don't remember.</p> <p>16 Q Did you promise Mr. Liu that you</p> <p>17 would confer with him before publicizing concerns</p> <p>18 regarding public officials in China?</p> <p>19 A I don't remember.</p> <p>20 Q Did you ask Mr. Liu if he would</p> <p>21 consider that action to be patriotic?</p> <p>22 A I don't remember.</p> <p>23 Q At the conclusion of your discussions</p> <p>24 with Mr. Liu, had the two of you agreed to take</p> <p>25 any follow-up steps?</p> <p style="text-align: right;">Page 293</p>
<p>1 GUO WENGUI</p> <p>2 Ching Ge to travel to and from China freely?</p> <p>3 INTERPRETER CHANG: Could you</p> <p>4 say that again.</p> <p>5 Q Did you negotiate with Mr. Liu for</p> <p>6 the ability of Guo Mei, Guo Chian and Wa Ching Ge</p> <p>7 (phonetic) to travel to and from China freely?</p> <p>8 A My son had been away from China all</p> <p>9 this time, so I never talked with him about my</p> <p>10 son.</p> <p>11 Q My question is what about Guo Mei?</p> <p>12 A Yes, I did. I also talked to him</p> <p>13 about my wife Yu.</p> <p>14 Q In fact, were Guo Mei and Uet Chinger</p> <p>15 (phonetic) able to travel to and from China after</p> <p>16 your discussions with Mr. Lee?</p> <p>17 A No treatment of back and forth. The</p> <p>18 condition is that they can only live for the</p> <p>19 United States and they cannot return.</p> <p>20 Q Did you have discussions with Mr. Liu</p> <p>21 about Sun Li Yun (phonetic) going to the Middle</p> <p>22 East and talking about you or coming to the U.S.</p> <p>23 and looking for a public relations firm?</p> <p>24 A I don't remember.</p> <p>25 Q Did you tell Mr. Sun that two and a</p> <p style="text-align: right;">Page 292</p>	<p>1 GUO WENGUI</p> <p>2 A No.</p> <p>3 Q Did you believe that your discussions</p> <p>4 with Mr. Liu would not resume after he left New</p> <p>5 York?</p> <p>6 MR. HARMON: Object to the form</p> <p>7 of the question.</p> <p>8 A Of course.</p> <p>9 Q When is the next time you spoke with</p> <p>10 Mr. Liu after he left New York?</p> <p>11 MR. HARMON: Object to the form</p> <p>12 of the question.</p> <p>13 A I don't think there's another time.</p> <p>14 INTERPRETER WILKINSON: As I</p> <p>15 recall.</p> <p>16 INTERPRETER CHANG: You can take</p> <p>17 your translation.</p> <p>18 MR. HARMON: I get it. Thank</p> <p>19 you.</p> <p>20 Obviously there's a possible of</p> <p>21 way of interpreting it at least both</p> <p>22 ways. As he recalls, he doesn't</p> <p>23 recall having another conversation.</p> <p>24 Next question.</p> <p>25 Q After Mr. Liu left New York in late</p> <p style="text-align: right;">Page 294</p>

16 (Pages 291 to 294)

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<p>1 GUO WENGUI</p> <p>2 May of 2017, when is the next time you</p> <p>3 communicated in any with the CCP or PRC official?</p> <p>4 A I don't remember.</p> <p>5 Q By the way, Mr. Liu also spoke</p> <p>6 directly with Guo Mei, didn't he?</p> <p>7 MR. HARMON: Objection to the</p> <p>8 form of the question.</p> <p>9 A I don't know.</p> <p>10 Q Did Mr. Liu tell you that he had</p> <p>11 spoken with Guo Mei before your meeting with him</p> <p>12 and had obtained a letter from her?</p> <p>13 MR. HARMON: Object to the form</p> <p>14 of the question.</p> <p>15 A I don't remember.</p> <p>16 Q Did you have any communications with</p> <p>17 CCP or PRC officials after May, 2017 through</p> <p>18 either of your children?</p> <p>19 MR. HARMON: Object to the form</p> <p>20 of the question.</p> <p>21 A No.</p> <p>22 Q Did either of your children convey</p> <p>23 messages to you after May, 2017 from any CCP or</p> <p>24 PRC official?</p> <p>25 A No.</p> <p style="text-align: right;">Page 295</p>	<p>1 GUO WENGUI</p> <p>2 MR. GREIM: Our position is it</p> <p>3 is within the scope because we</p> <p>4 believe that Mr. Bannon served as an</p> <p>5 intermediary. But we won't need to</p> <p>6 do this on the record here.</p> <p>7 Q Did you write a letter to Senior CCP</p> <p>8 officials in August of 2017?</p> <p>9 A I don't recall.</p> <p>10 INTERPRETER WILKINSON: August.</p> <p>11 INTERPRETER CHANG: Did you say</p> <p>12 August?</p> <p>13 Q Yes.</p> <p>14 A I don't remember.</p> <p>15 Q I'm going to show you now, sir, what</p> <p>16 we have transcribed as video 4, which is, I will</p> <p>17 represent to you, a portion of a minute Ming Jing</p> <p>18 broadcast in which you are interviewed by a Ming</p> <p>19 Jing reporter. This is again video 4.</p> <p>20 Before I do that, Mr. Guo, I think</p> <p>21 you testified earlier that you have appeared on</p> <p>22 Ming Jing before; is that correct?</p> <p>23 A Yes.</p> <p>24 Q And what is the name of the reporter</p> <p>25 who typically questions you on the program?</p> <p style="text-align: right;">Page 297</p>
<p>1 GUO WENGUI</p> <p>2 Q Did any other person communicate</p> <p>3 messages from you to CCP or PRC officials after</p> <p>4 May of 2017?</p> <p>5 MR. HARMON: Objection to the</p> <p>6 form of the question.</p> <p>7 A No.</p> <p>8 Q Did any other person communicate</p> <p>9 messages from CCP or PRC officials to you after</p> <p>10 May of 2017?</p> <p>11 A No.</p> <p>12 Q Did Mr. Steve Bannon communicate</p> <p>13 messages from you to any CCP or PRC official or</p> <p>14 from any CCP or PRC official to you after May of</p> <p>15 2017.</p> <p>16 A No. That is ridiculous.</p> <p>17 Q Did Mr. Bannon report to you on his</p> <p>18 September, 2017 meeting with Wan Chi Shan when he</p> <p>19 met with you in October of 2017?</p> <p>20 MR. HARMON: Object to the form</p> <p>21 of the question. I think that's</p> <p>22 beyond the scope of what you're</p> <p>23 entitled to inquire about.</p> <p>24 In fact, I'm sure of it. I'll</p> <p>25 direct the witness not to answer.</p> <p style="text-align: right;">Page 296</p>	<p>1 GUO WENGUI</p> <p>2 MR. HARMON: Objection to the</p> <p>3 form of the question.</p> <p>4 A I don't remember exactly.</p> <p>5 Q Is his name Mr. Cheen?</p> <p>6 A Yes. The one by the last name</p> <p>7 C-H-E-E-N. Xioping, X-I-O-P-I-N-G.</p> <p>8 Q The transcription begins on page SVUS</p> <p>9 1320. I will now play it for you?</p> <p>10 MR. HARMON: You said 1320?</p> <p>11 MR. GREIM: Correct. SVUS1320.</p> <p>12 MR. HARMON: Video 4?</p> <p>13 MR. GREIM: Video 4.</p> <p>14 MR. HARMON: Mine begins on 1331</p> <p>15 unless there is a 4A.</p> <p>16 MR. GREIM: There is a 4A. I'm</p> <p>17 not sure why that's true, but this is</p> <p>18 video 4.</p> <p>19 MR. HARMON: Give me a moment.</p> <p>20 Q I will play for you from the very</p> <p>21 beginning of the tape through the beginning of</p> <p>22 minute 6.</p> <p>23 MR. HARMON: Do you need to play</p> <p>24 six minutes worth of tape to</p> <p>25 determine whether it's him?</p> <p style="text-align: right;">Page 298</p>

17 (Pages 295 to 298)

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<p>1 GUO WENGUI</p> <p>2 MR. GREIM: We do and you'll see</p> <p>3 why in a minute.</p> <p>4 MR. HARMON: I am sure I will</p> <p>5 not see why, but it seems like a</p> <p>6 waste of time.</p> <p>7 MR. GREIM: Go ahead.</p> <p>8 MR. HARMON: I just think it</p> <p>9 doesn't take six minutes of playing</p> <p>10 for him to determine whether it's</p> <p>11 authentic.</p> <p>12 Q Before I hit play on this, Mr. Guo,</p> <p>13 can you see my -- can you see the computer I have</p> <p>14 here?</p> <p>15 A Yes.</p> <p>16 Q Do you recognize Mr. Chen and</p> <p>17 yourself in the screen?</p> <p>18 A Yes.</p> <p>19 Q I will now play this. What I may do</p> <p>20 is I may break it up in the middle, but I will</p> <p>21 start, and then I'll announce when I stop.</p> <p>22 (At this time the video was played.)</p> <p>23 Q I'm going to stop for a moment. I</p> <p>24 stopped at second 32.</p> <p>25 Mr. Guo, I think I'm going to</p> <p style="text-align: right;">Page 299</p>	<p>1 GUO WENGUI</p> <p>2 are from (inaudible) Wang Chi Sung.</p> <p>3 There are hundreds and millions of</p> <p>4 such fake clips on the Internet. I cannot say</p> <p>5 this is authentic one. I can only recognize my</p> <p>6 own face and my tie. Nothing else I can identify.</p> <p>7 Q So is it your testimony, sir, that</p> <p>8 you did not appear on Ming Ging and talk about a</p> <p>9 letter that you wrote to President Gi and</p> <p>10 Secretary Mang Giangu? (Phonetic)</p> <p>11 MR. HARMON: Object to the form</p> <p>12 of the question.</p> <p>13 INTERPRETER WILKINSON: Counsel,</p> <p>14 your question was are you saying that</p> <p>15 you never appear on the media with</p> <p>16 the Ming Ging and then talking about</p> <p>17 this letter you wrote to Wung Gi</p> <p>18 Shan.</p> <p>19 INTERPRETER CHANG: No. No.</p> <p>20 Let me repeat the question. It's not</p> <p>21 yours.</p> <p>22 INTERPRETER WILKINSON: I'm</p> <p>23 marking some of your questions</p> <p>24 because the interpreter did not</p> <p>25 interpret the question like that;</p> <p style="text-align: right;">Page 301</p>
<p>1 GUO WENGUI</p> <p>2 approach you so you can actually view the letter</p> <p>3 that's displayed on the screen on the broadcast.</p> <p>4 I'm just going to come a little</p> <p>5 closer. I'm going to hit play, and we may not go</p> <p>6 all the way through five minutes. I've stopped it</p> <p>7 at minute 53.</p> <p>8 Mr. Guo, did you recognize the letter</p> <p>9 that the host displayed on the screen while</p> <p>10 speaking with you?</p> <p>11 A No.</p> <p>12 Q Do you recognize this as a broadcast</p> <p>13 that you did with Mr. Chen?</p> <p>14 MR. HARMON: Object to the form</p> <p>15 of the question.</p> <p>16 A No.</p> <p>17 Q For the record, I'm going to play</p> <p>18 again at minute 5:11. I've stopped it at 6</p> <p>19 minutes and 56 seconds.</p> <p>20 I would now ask you, Mr. Guo, is this</p> <p>21 not a video of your appearance on Ming Ging with</p> <p>22 Mr. Chin?</p> <p>23 A Ming Ging is representing Chinese</p> <p>24 Communist Party. They are making accusations and</p> <p>25 lies and everything. All their friends are from</p> <p style="text-align: right;">Page 300</p>	<p>1 GUO WENGUI</p> <p>2 right?</p> <p>3 MR. HARMON: Ask the question</p> <p>4 again and have it interpreted again.</p> <p>5 Maybe break down the question into</p> <p>6 pieces so that it's easy to</p> <p>7 translate.</p> <p>8 Q Mr. Guo, do you deny that I have just</p> <p>9 shown you a clip of your appearance on Ming Jing</p> <p>10 TV?</p> <p>11 MR. HARMON: Object to the form</p> <p>12 of the question.</p> <p>13 A I cannot validate the timing of the</p> <p>14 content of this interview. I simply do not</p> <p>15 recall.</p> <p>16 Q Did you not tell the host that your</p> <p>17 letter was written to President Gi and Secretary</p> <p>18 Ming Gian Ju? (Phonetic)</p> <p>19 MR. HARMON: Object to the form</p> <p>20 of the question.</p> <p>21 A I don't remember.</p> <p>22 Q Do you deny that you wrote the letter</p> <p>23 that was displayed on this broadcast?</p> <p>24 MR. HARMON: Object to the form</p> <p>25 of the question.</p> <p style="text-align: right;">Page 302</p>

18 (Pages 299 to 302)

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<p>1 GUO WENGUI</p> <p>2 A I don't remember.</p> <p>3 Q Who drafted the letter?</p> <p>4 MR. HARMON: Object to the form</p> <p>5 of the question.</p> <p>6 A I really don't know.</p> <p>7 Q Did you sign it?</p> <p>8 MR. HARMON: Object to the form</p> <p>9 of the question.</p> <p>10 A I don't remember.</p> <p>11 Q Did you transmit it to anyone?</p> <p>12 MR. HARMON: Object to the form</p> <p>13 of the question.</p> <p>14 A I don't remember.</p> <p>15 Q So you neither admit nor deny that I</p> <p>16 have shown you a portion of a clip of an</p> <p>17 appearance you made on Mira Media?</p> <p>18 MR. HARMON: Object to the form</p> <p>19 of the question.</p> <p>20 A I had many interviews with them, but</p> <p>21 I don't remember this particular one.</p> <p>22 Q Do you recall being given a red line</p> <p>23 by the CCP or PRC officials that you could not</p> <p>24 cross?</p> <p>25 MR. HARMON: Object to the form</p> <p style="text-align: right;">Page 303</p>	<p>1 GUO WENGUI</p> <p>2 approach the witness one more time.</p> <p>3 (At this time, the video was played).</p> <p>4 A I want to make sure I understand.</p> <p>5 Who is asking questions, you the lawyer, or the</p> <p>6 video? The guy who is a cheater is asking</p> <p>7 questions.</p> <p>8 Q Mr. Guo, you have to stop disrupting</p> <p>9 the deposition.</p> <p>10 MR. HARMON: Okay. He's not</p> <p>11 disrupting the deposition.</p> <p>12 MR. GREIM: Yes, he is. This is</p> <p>13 ridiculous.</p> <p>14 MR. HARMON: Ask your next</p> <p>15 question.</p> <p>16 MR. GREIM: I can't because the</p> <p>17 witness just keeps talking.</p> <p>18 MR. HARMON: Ask your next</p> <p>19 question.</p> <p>20 MR. GREIM: We will have to ask</p> <p>21 for more time if this continues.</p> <p>22 MR. HARMON: Ask your next</p> <p>23 question.</p> <p>24 Q The question, sir, is do you</p> <p>25 recognize the signature on the document I placed</p> <p style="text-align: right;">Page 305</p>
<p>1 GUO WENGUI</p> <p>2 of the question.</p> <p>3 A I don't understand what you referring</p> <p>4 to. Because like Trump, everything is talking</p> <p>5 about it. She has friends. Now he also want to</p> <p>6 stop Hua Wei.</p> <p>7 MR. GREIM: Move to strike.</p> <p>8 A The telecom company in China, that's</p> <p>9 what he's referring to.</p> <p>10 MR. GREIM: Move to strike as</p> <p>11 non-responsive.</p> <p>12 Q Did you receive any communications</p> <p>13 from the CCP or PRC in response to this letter?</p> <p>14 MR. HARMON: Object to the form</p> <p>15 of the question.</p> <p>16 A I don't understand and I don't</p> <p>17 remember.</p> <p>18 Q What don't you understand about my</p> <p>19 question?</p> <p>20 MR. HARMON: Object to the form</p> <p>21 of the question.</p> <p>22 A Because I don't know what you said</p> <p>23 about this letter.</p> <p>24 Q Do you recall?</p> <p>25 MR. GREIM: I'm going to</p> <p style="text-align: right;">Page 304</p>	<p>1 GUO WENGUI</p> <p>2 in front of you on my computer.</p> <p>3 A It's my name, but I don't think</p> <p>4 that's my signature.</p> <p>5 Q So Mr. Guo, do you deny sending this</p> <p>6 letter to CCP and PRC officials in August of 2017?</p> <p>7 MR. HARMON: Object to the form</p> <p>8 of the question.</p> <p>9 A I've never sent this letter.</p> <p>10 Q Did anyone send this letter to CCP</p> <p>11 and PRC officials on your behalf?</p> <p>12 MR. HARMON: Object to the form</p> <p>13 of the question.</p> <p>14 A That I wouldn't know.</p> <p>15 Q Have you seen it before today?</p> <p>16 A It's all over on the Internet.</p> <p>17 Q Did you agree to the terms in this</p> <p>18 letter?</p> <p>19 MR. HARMON: Object to the form</p> <p>20 of the question.</p> <p>21 A I totally do not agree with any of</p> <p>22 the terms in this letter.</p> <p>23 Q In August of 2017, did you agree to</p> <p>24 the terms of the letter?</p> <p>25 MR. HARMON: Asked and answered.</p> <p style="text-align: right;">Page 306</p>

19 (Pages 303 to 306)

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<p>1 GUO WENGUI</p> <p>2 You're just wasting time. Objection</p> <p>3 to the form of the question.</p> <p>4 Answer it again.</p> <p>5 A No.</p> <p>6 INTERPRETER WILKINSON: Counsel,</p> <p>7 your question was that the witness</p> <p>8 agreed with the terms in August,</p> <p>9 2017, right, not whether he wrote</p> <p>10 this letter?</p> <p>11 MR. GREIM: Correct.</p> <p>12 INTERPRETER CHANG: You can take</p> <p>13 her translation.</p> <p>14 A No. I want to know the source of</p> <p>15 this thing.</p> <p>16 Q Did anyone provide you advice</p> <p>17 regarding this letter?</p> <p>18 MR. HARMON: Object to the form</p> <p>19 of the question.</p> <p>20 A No.</p> <p>21 Q Did you discuss this letter with any</p> <p>22 CCP or PRC official?</p> <p>23 MR. HARMON: Object to the form</p> <p>24 of the question.</p> <p>25 A I'm not aware of the existence of</p> <p style="text-align: right;">Page 307</p>	<p>1 GUO WENGUI</p> <p>2 Q Could you have written this letter?</p> <p>3 MR. HARMON: Objection.</p> <p>4 A I don't know how to use computers. I</p> <p>5 can't type. So I couldn't have typed this letter.</p> <p>6 Whoever made this up saying this is my letter is a</p> <p>7 total idiot.</p> <p>8 Q Did Yvette Wong prepare this letter</p> <p>9 for you?</p> <p>10 A No.</p> <p>11 Q Did the CCP or PRC prepare this</p> <p>12 letter for you?</p> <p>13 MR. HARMON: Objection to the</p> <p>14 form of the question.</p> <p>15 A I don't know.</p> <p>16 Q Did someone give this letter to you?</p> <p>17 A Let me repeat it. No one had ever</p> <p>18 given me this letter. I have nothing to do with</p> <p>19 this letter.</p> <p>20 Q In August of 2017, did you promise to</p> <p>21 help promote President Gi Jong Ping's (phonetic)</p> <p>22 agenda in the United States?</p> <p>23 A No. This is a total lie.</p> <p>24 Q Do you recall discussing this letter</p> <p>25 with Mr. Chen for at least half an hour on Mira</p> <p style="text-align: right;">Page 309</p>
<p>1 GUO WENGUI</p> <p>2 this letter, so therefore my question is no.</p> <p>3 A My answer is no.</p> <p>4 Q So is it your testimony now that you</p> <p>5 definitively deny having sent this letter to the</p> <p>6 CCP and PRC?</p> <p>7 MR. HARMON: Object to the form</p> <p>8 of the question.</p> <p>9 A Yes, I deny.</p> <p>10 Q Is it your testimony that Mira Media</p> <p>11 fabricated this letter or this broadcast?</p> <p>12 MR. HARMON: Object to the form</p> <p>13 of the question. Calls for</p> <p>14 speculation.</p> <p>15 A No.</p> <p>16 Q Could this letter have been written</p> <p>17 by you?</p> <p>18 MR. HARMON: Object to the form</p> <p>19 of the question. Hypothetical.</p> <p>20 INTERPRETER WILKINSON: Counsel</p> <p>21 did ask a question, but then you did</p> <p>22 not interpret the question.</p> <p>23 INTERPRETER CHANG: I haven't</p> <p>24 come to that yet. Give me a few</p> <p>25 questions.</p> <p style="text-align: right;">Page 308</p>	<p>1 GUO WENGUI</p> <p>2 Media?</p> <p>3 A I don't remember.</p> <p>4 Q I'm going to play the tape beginning</p> <p>5 at 8:07, sir. Then I will have a question for you.</p> <p>6 MR. HARMON: Playing a tape,</p> <p>7 Video 4, that he's been unable to</p> <p>8 authenticate.</p> <p>9 MR. GREIM: To be clear, I'm</p> <p>10 playing video 4.</p> <p>11 MR. HARMON: Thank you.</p> <p>12 MR. GREIM: I'm playing now. I</p> <p>13 will go back because the</p> <p>14 clarification interrupted. I will go</p> <p>15 back to 8:09 minutes.</p> <p>16 (At this time the video was</p> <p>17 played.)</p> <p>18 Q I played to minute 8:44.</p> <p>19 Mr. Guo, did Mr. Chen not ask you</p> <p>20 about the third page of the letter and in</p> <p>21 particular about your statement that I still</p> <p>22 maintain my trust to the organization and to you.</p> <p>23 I didn't cross the red line.</p> <p>24 MR. HARMON: Object to the form</p> <p>25 of the question.</p> <p style="text-align: right;">Page 310</p>

20 (Pages 307 to 310)

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<p>1 GUO WENGUI</p> <p>2 Q Did you hear that question from</p> <p>3 Mr. Chen?</p> <p>4 MR. HARMON: Object to the form</p> <p>5 of the question to the form of the</p> <p>6 question.</p> <p>7 A I don't remember.</p> <p>8 Q My question is --</p> <p>9 A There's something I missed about the</p> <p>10 trust --</p> <p>11 INTERPRETER WILKINSON: Counsel</p> <p>12 said that the trust to you and the</p> <p>13 organization and did not cross red</p> <p>14 line.</p> <p>15 MR. GREIM: Correct.</p> <p>16 A No, I don't remember.</p> <p>17 Q Mr. Guo, did you not just hear</p> <p>18 yourself respond that the red line means you</p> <p>19 didn't put out videos and leaked the national</p> <p>20 intelligence network. You didn't say who the</p> <p>21 CCP's leader's wife was sleeping with.</p> <p>22 MR. HARMON: I object. Mr. Guo</p> <p>23 has already said that he cannot</p> <p>24 identify the person speaking on that</p> <p>25 recording as himself. He can't</p> <p style="text-align: right;">Page 311</p>	<p>1 GUO WENGUI</p> <p>2 continue with the question.</p> <p>3 Q Mr. Guo, we just listened to -- we</p> <p>4 just listened to about a minute of the video in</p> <p>5 which Mr. Chen, who you did identify at the start</p> <p>6 of this video, asks you a question about the red</p> <p>7 line, and then --</p> <p>8 INTERPRETER CHANG: Can you stop</p> <p>9 here so I can do what I have to do.</p> <p>10 Q Do you deny that we just watched you</p> <p>11 give a response to Mr. Chen's question?</p> <p>12 MR. HARMON: I object to your</p> <p>13 question on the same basis that I did</p> <p>14 before, that the inclusion in your</p> <p>15 question of a representation, that</p> <p>16 that is a video of Mr. Qua when he</p> <p>17 has denied that it's an authentic</p> <p>18 tape and has questioned the</p> <p>19 authenticity of the tape and the</p> <p>20 video and its source.</p> <p>21 And again, continuing to ask him</p> <p>22 questions about something that he has</p> <p>23 not authenticated is a huge waste of</p> <p>24 time. If you cannot authenticate it</p> <p>25 independently, then you can use the</p> <p style="text-align: right;">Page 313</p>
<p>1 GUO WENGUI</p> <p>2 authenticate the recording. And your</p> <p>3 statement of a question asking him</p> <p>4 whether or not he said something</p> <p>5 based upon that is without foundation</p> <p>6 and a huge waste of our time.</p> <p>7 Q The witness may answer the question.</p> <p>8 A I don't remember.</p> <p>9 THE INTERPRETER: He didn't ask</p> <p>10 the question yet.</p> <p>11 INTERPRETER CHANG: This is</p> <p>12 making a tough, tough job.</p> <p>13 MR. HARMON: No pictures; right?</p> <p>14 MR. GREIM: Don't talk to my</p> <p>15 client here. She's not taking</p> <p>16 pictures. And before I forget, I</p> <p>17 want to make sure that Miss Wang's</p> <p>18 pictures are also deleted from her</p> <p>19 phone. We'll do it before we leave.</p> <p>20 MR. HARMON: We'll take care of</p> <p>21 that.</p> <p>22 INTERPRETER WILKINSON: She's</p> <p>23 keeps on pointing the phone at my</p> <p>24 face.</p> <p>25 MR. GREIM: Please let me</p> <p style="text-align: right;">Page 312</p>	<p>1 GUO WENGUI</p> <p>2 recording for anything you want.</p> <p>3 But asking Mr. Kwok questions</p> <p>4 about something that he can't</p> <p>5 authenticate is just wasteful of</p> <p>6 everybody's time.</p> <p>7 You can now ask the question.</p> <p>8 MR. GREIM: Go ahead and ask the</p> <p>9 question if you can remember what I</p> <p>10 asked him.</p> <p>11 A I said I can tell you that there is</p> <p>12 more than the one time they interview me. But I</p> <p>13 cannot validate this one existed or its</p> <p>14 authenticity.</p> <p>15 Q But to be very, very clear, I'm going</p> <p>16 to be clear about this, you do not deny that this</p> <p>17 is an interview of you with Mr. Chen. You simply</p> <p>18 cannot validate that it is; is that correct?</p> <p>19 MR. HARMON: Object to the form</p> <p>20 of the question.</p> <p>21 INTERPRETER CHANG: Can you</p> <p>22 repeat it.</p> <p>23 Q To be very clear, you do not deny</p> <p>24 that this is a video of you with Mr. Chen. You</p> <p>25 simply say that you cannot validate that it is?</p> <p style="text-align: right;">Page 314</p>

21 (Pages 311 to 314)

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<p>1 GUO WENGUI</p> <p>2 MR. HARMON: Object to the form</p> <p>3 of the question.</p> <p>4 INTERPRETER WILKINSON: The</p> <p>5 video, not just the interview. The</p> <p>6 video of this interview.</p> <p>7 A I have been interviewed by them for</p> <p>8 more than once, but I cannot tell you the</p> <p>9 authenticity of this one.</p> <p>10 MR. GREIM: Let's go ahead and</p> <p>11 take a break.</p> <p>12 (At this time, a brief recess</p> <p>13 was taken.)</p> <p>14 THE VIDEOGRAPHER: The time is</p> <p>15 2:08 p.m., Wednesday, December 4,</p> <p>16 2019. This is the end of media</p> <p>17 number 2, volume 2 of the videotaped</p> <p>18 deposition of Mr. Guo Wengui.</p> <p>19 We're off the record.</p> <p>20 (Time noted: 2:08 p.m.)</p> <p>21 (At this time, a brief recess</p> <p>22 was taken.)</p> <p>23 THE VIDEOGRAPHER: The time is</p> <p>24 2:19 p.m., Wednesday, December 4,</p> <p>25 2019. This is media number 3, volume</p> <p style="text-align: right;">Page 315</p>	<p>1 GUO WENGUI</p> <p>2 any signals to anybody. She's going</p> <p>3 to stay where she is.</p> <p>4 MR. GREIM: She has been and it</p> <p>5 needs to stop.</p> <p>6 MR. HARMON: She's going to stay</p> <p>7 where she is. She hasn't done</p> <p>8 anything, and she is not moving, so</p> <p>9 go ahead.</p> <p>10 Q What are some of the other names that</p> <p>11 Mr. Yu goes by?</p> <p>12 A I don't know.</p> <p>13 MR. HARMON: Really? You're</p> <p>14 going to video her?</p> <p>15 INTERPRETER WILKINSON: I'm</p> <p>16 going to video her.</p> <p>17 MR. GREIM: No, you're not.</p> <p>18 We'll raise this with the court</p> <p>19 later.</p> <p>20 Q Do you know the name William Je, J-E?</p> <p>21 A They are the same person, William Je</p> <p>22 and William Yu.</p> <p>23 Q What about the name Je Kay Ming?</p> <p>24 A I don't know this person.</p> <p>25 Q Do you know the name Yu Gian Ming?</p> <p style="text-align: right;">Page 317</p>
<p>1 GUO WENGUI</p> <p>2 2 of the videotaped deposition of</p> <p>3 Mr. Guo Wengui. We are back on the</p> <p>4 record.</p> <p>5 EXAMINATION BY</p> <p>6 MR. GREIM:</p> <p>7 Q Mr. Guo, your first deposition I</p> <p>8 asked you some questions about a man we identified</p> <p>9 as William Yu.</p> <p>10 Do you remember those questions?</p> <p>11 A Yes.</p> <p>12 Q Do you know him by any other names?</p> <p>13 A I don't know.</p> <p>14 MR. GREIM: Before we go much</p> <p>15 further, I just want to point out we</p> <p>16 object to Miss Wang standing back</p> <p>17 behind the videographer directly in</p> <p>18 the line of sight of the witness.</p> <p>19 There have been a lot of facial</p> <p>20 gestures, nodding yes and no on</p> <p>21 questions, and I would like that</p> <p>22 stopped.</p> <p>23 A You're totally lying.</p> <p>24 MR. HARMON: I've been looking</p> <p>25 at Miss Wang. She's not providing</p> <p style="text-align: right;">Page 316</p>	<p>1 GUO WENGUI</p> <p>2 A William used the Chinese name.</p> <p>3 Q Do you know which of those is his</p> <p>4 legal name?</p> <p>5 MR. HARMON: Object to the form</p> <p>6 of the question.</p> <p>7 A I don't know.</p> <p>8 Q Do you know what country or countries</p> <p>9 he's a citizen in?</p> <p>10 A I don't know.</p> <p>11 Q When did you last see him?</p> <p>12 A About two months ago.</p> <p>13 Q Where was this?</p> <p>14 A In New York.</p> <p>15 Q How frequently do you see Mr. Gi?</p> <p>16 MR. HARMON: Object to the form</p> <p>17 of the question.</p> <p>18 A Three, four times. Two to three</p> <p>19 times a year.</p> <p>20 Q Do you E-mail or call him?</p> <p>21 A Calling him.</p> <p>22 Q Where did you first meet Mr. Gi?</p> <p>23 A In the office on the social occasion.</p> <p>24 Q Which office?</p> <p>25 A I don't know. I really don't recall</p> <p style="text-align: right;">Page 318</p>

22 (Pages 315 to 318)

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<p>1 GUO WENGUI</p> <p>2 that.</p> <p>3 Q Is this in Beijing?</p> <p>4 A I don't recall.</p> <p>5 Q Are you aware that he is a director</p> <p>6 of an entity whose name includes AC?</p> <p>7 MR. HARMON: Object to the form</p> <p>8 of the question. It was asked and</p> <p>9 answered at the last deposition.</p> <p>10 A Yes.</p> <p>11 Q How did he come to be a director of</p> <p>12 ACA?</p> <p>13 A I don't know.</p> <p>14 Q Is ACA an entity that you started?</p> <p>15 A I don't know.</p> <p>16 MR. HARMON: Yvette, come around</p> <p>17 the other side please.</p> <p>18 MR. GREIM: Miss Wang is sitting</p> <p>19 around directly behind my client.</p> <p>20 MR. HARMON: Yvette, please come</p> <p>21 around.</p> <p>22 I would ask you, Mr. Greim, to</p> <p>23 ask your client even if she's only</p> <p>24 using her phone for the purposes to</p> <p>25 keep it down so it doesn't appear</p> <p style="text-align: right;">Page 319</p>	<p>1 GUO WENGUI</p> <p>2 A Because he told me that the</p> <p>3 government that take his people in Hong Kong and</p> <p>4 that the police went to threats that his mother in</p> <p>5 her home and get him so frightened that he had to</p> <p>6 be hospitalized.</p> <p>7 INTERPRETER WILKINSON: And</p> <p>8 every day people call him telling him</p> <p>9 to kill him; right?</p> <p>10 A Yes. He also said they are making</p> <p>11 the phone calls that threaten them by killing them</p> <p>12 making daily phone calls.</p> <p>13 Q When did Mr. Gi first tell you that</p> <p>14 the government was persecuting his people in Hong</p> <p>15 Kong?</p> <p>16 A I don't remember exactly.</p> <p>17 Q Did you know Mr. Gi before you came</p> <p>18 to the United States in 2015?</p> <p>19 MR. HARMON: Object to the form</p> <p>20 of the question.</p> <p>21 A Yes.</p> <p>22 Q How?</p> <p>23 A I don't remember.</p> <p>24 Q Were you a client of his?</p> <p>25 A No.</p> <p style="text-align: right;">Page 321</p>
<p>1 GUO WENGUI</p> <p>2 that she's taking videos and photos.</p> <p>3 MR. GREIM: I would ask the same</p> <p>4 thing of Miss Wang.</p> <p>5 MR. HARMON: Absolutely.</p> <p>6 Everybody put their phones down.</p> <p>7 MR. GREIM: That's the new rule.</p> <p>8 Q You recall your first deposition you</p> <p>9 claimed you worked with Mr. Gi on anti-communist</p> <p>10 matters?</p> <p>11 MR. HARMON: Object to the form</p> <p>12 of the question.</p> <p>13 A I don't remember.</p> <p>14 Q Is it true that you have worked with</p> <p>15 Mr. Gi in the past on what you characterize as</p> <p>16 anti-communist matters?</p> <p>17 A I don't know how to say that, the</p> <p>18 working together. But in Chinese, we say we are</p> <p>19 both anti-communists.</p> <p>20 Q How do you know Mr. Gi is</p> <p>21 anti-communist?</p> <p>22 A Because he told me so. He was</p> <p>23 persecuted by the communist party right now.</p> <p>24 Q How do you know Mr. Gi was persecuted</p> <p>25 by the communist party?</p> <p style="text-align: right;">Page 320</p>	<p>1 GUO WENGUI</p> <p>2 Q Did he work for you?</p> <p>3 A No.</p> <p>4 Q Did you know him as chairman of the</p> <p>5 greater China securities section of Maquery?</p> <p>6 (Phonetic)</p> <p>7 MR. HARMON: Object to the form</p> <p>8 of the question.</p> <p>9 A Yes.</p> <p>10 Q Did you recruit him to leave Maquery</p> <p>11 and join ACA?</p> <p>12 A I don't remember.</p> <p>13 Q Did you ask him to join ACA?</p> <p>14 A No.</p> <p>15 Q How was ACA formed?</p> <p>16 MR. HARMON: These questions</p> <p>17 were asked and answered at his last</p> <p>18 deposition.</p> <p>19 A No, I don't know.</p> <p>20 Q Mr. Guo, did you solicit money from</p> <p>21 investors in the United Emirates to begin ACA?</p> <p>22 MR. HARMON: I'm going to permit</p> <p>23 Mr. Guo to answer this question, but</p> <p>24 it's clearly outside the very limited</p> <p>25 scope that magistrate Freeman</p> <p style="text-align: right;">Page 322</p>

23 (Pages 319 to 322)

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<p>1 GUO WENGUI</p> <p>2 permitted you to examine regarding</p> <p>3 ACA which was limited to ownership</p> <p>4 and control of the company, all of</p> <p>5 which questions were asked and</p> <p>6 answered at the last deposition.</p> <p>7 MR. GREIM: That's incorrect.</p> <p>8 MR. HARMON: It's not incorrect.</p> <p>9 MR. GREIM: This would go to the</p> <p>10 ownership and control of ACA.</p> <p>11 Go ahead.</p> <p>12 A I don't know.</p> <p>13 Q Did Mr. Gi tell you that his family</p> <p>14 was persecuted just in Hong Kong or on the</p> <p>15 mainland as well?</p> <p>16 MR. PODHASKIE: Object to the</p> <p>17 form of the question.</p> <p>18 A Yes. In both locations.</p> <p>19 Q Other than what Mr. Gi has told you,</p> <p>20 do you have any information about whether Mr. Gi's</p> <p>21 family has been persecuted by the CCP?</p> <p>22 A I don't know.</p> <p>23 Q After you came to the United States</p> <p>24 in 2015, when is the first time that you</p> <p>25 communicated with Mr. Gi?</p> <p style="text-align: right;">Page 323</p>	<p>1 GUO WENGUI</p> <p>2 you received distributions from an ACA contract</p> <p>3 with Golden Spring?</p> <p>4 MR. HARMON: Magistrate Freeman</p> <p>5 specifically said that you were not</p> <p>6 to ask questions about the details of</p> <p>7 payments involving ACA, that the</p> <p>8 questioning was limited to his</p> <p>9 knowledge of the ownership and</p> <p>10 control of ACA. And you're way far</p> <p>11 afield.</p> <p>12 MR. GREIM: The magistrate also</p> <p>13 said we can ask about transfers of</p> <p>14 money from ACA. We're not getting</p> <p>15 into the details. This goes directly</p> <p>16 to this witness' knowledge and</p> <p>17 relationship with ACA.</p> <p>18 We mentioned this declaration in</p> <p>19 our filings with the court. If we</p> <p>20 can't ask the question, we'll need to</p> <p>21 get the court on the line.</p> <p>22 MR. HARMON: You're just wasting</p> <p>23 time. I'm going to let him answer</p> <p>24 this question, but really get to</p> <p>25 something you're allowed to talk</p> <p style="text-align: right;">Page 325</p>
<p>1 GUO WENGUI</p> <p>2 A I don't remember.</p> <p>3 Q Was it within a few weeks or a few</p> <p>4 months?</p> <p>5 A I don't remember.</p> <p>6 Q Have you heard of an ACA entity</p> <p>7 called ACA Capital Group?</p> <p>8 A I don't remember.</p> <p>9 Q Have you heard of ACA Investment</p> <p>10 Management Limited?</p> <p>11 A To all the English names I could not</p> <p>12 remember.</p> <p>13 Q Has your entity Golden Spring Hong</p> <p>14 Kong been retained by an ACA entity to give advice</p> <p>15 regarding the mainland?</p> <p>16 MR. HARMON: Object to the form</p> <p>17 of the question. And that's way</p> <p>18 outside the scope of anything that</p> <p>19 Magistrate Freeman allowed. Let's</p> <p>20 move on it.</p> <p>21 It was related to ownership and</p> <p>22 control, and he denied knowing</p> <p>23 anything about the ownership of ACA.</p> <p>24 A I don't know.</p> <p>25 Q Have you alleged in a lawsuit that</p> <p style="text-align: right;">Page 324</p>	<p>1 GUO WENGUI</p> <p>2 about that makes sense.</p> <p>3 MR. GREIM: We are.</p> <p>4 Let's have the court reporter</p> <p>5 read it back.</p> <p>6 (The requested portion of the</p> <p>7 record was read back by the</p> <p>8 reporter.)</p> <p>9 A I don't remember.</p> <p>10 Q Are you aware of William Gi's ongoing</p> <p>11 activities within the mainland?</p> <p>12 MR. HARMON: Object to the form</p> <p>13 of the question.</p> <p>14 A I don't know.</p> <p>15 Q Are you aware that Mr. Gi gave a</p> <p>16 speech on the mainland as recently as September of</p> <p>17 this year?</p> <p>18 MR. HARMON: Object to the form</p> <p>19 of the question.</p> <p>20 A I don't know. This is a very</p> <p>21 ridiculous question.</p> <p>22 Q Are you aware that Mr. G is a member</p> <p>23 of Chong King Political Consultative Conference?</p> <p>24 MR. HARMON: Object to the form</p> <p>25 of the question.</p> <p style="text-align: right;">Page 326</p>

24 (Pages 323 to 326)

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<p>1 GUO WENGUI</p> <p>2 A I don't know.</p> <p>3 Q Mr. Guo, isn't it true that Mr. Gi's</p> <p>4 entity hired you to give Mr. Gi advice about</p> <p>5 business connections on the mainland in 2017 and</p> <p>6 2018?</p> <p>7 A This is 100 percent false.</p> <p>8 Q Mr. Guo, is your son the sole</p> <p>9 director of ACA Hong Kong Investment Holdings?</p> <p>10 A I really don't know anything about</p> <p>11 what my son's involvement. I only know he's my</p> <p>12 son.</p> <p>13 Q Did you use ACA in May of 2015 to</p> <p>14 purchase a stake in Haitong Securities?</p> <p>15 MR. HARMON: Object to the form</p> <p>16 of the question. Beyond the scope of</p> <p>17 allowed testimony.</p> <p>18 Just yes or no.</p> <p>19 A No.</p> <p>20 Q Are you aware that ACA -- that</p> <p>21 actually every single ACA entity has had</p> <p>22 registered offices in your own residence in Hong</p> <p>23 Kong?</p> <p>24 MR. HARMON: Object to the form</p> <p>25 of the question.</p> <p style="text-align: right;">Page 327</p>	<p>1 GUO WENGUI</p> <p>2 Williams & Connolly for attorneys' fees for you?</p> <p>3 MR. HARMON: Asked and answered</p> <p>4 at the last examination.</p> <p>5 MR. GREIM: You wouldn't let him</p> <p>6 answer.</p> <p>7 MR. HARMON: I believe it was</p> <p>8 asked and answered, and I also</p> <p>9 believe it's beyond the scope of what</p> <p>10 Magistrate Freeman permitted.</p> <p>11 I will let him answer this</p> <p>12 question. Please let's try to stay</p> <p>13 within the framework of what's</p> <p>14 allowed.</p> <p>15 A I don't remember.</p> <p>16 Q Has ACA made any payments or loans to</p> <p>17 any entity based at 162 or 164 East 64th Street,</p> <p>18 New York City?</p> <p>19 MR. HARMON: Object to the form</p> <p>20 of the question.</p> <p>21 A I don't know.</p> <p>22 Q Do you have your office at 164 East</p> <p>23 64th Street?</p> <p>24 A I don't have an office. I go to that</p> <p>25 address for a meeting now and then.</p> <p style="text-align: right;">Page 329</p>
<p>1 GUO WENGUI</p> <p>2 A That I don't know. Already my Hong</p> <p>3 Kong residence, I don't know.</p> <p>4 Q What is your Hong Kong residence?</p> <p>5 What's the address?</p> <p>6 A I live in hotels in Hong Kong because</p> <p>7 I -- this is like -- I don't know where the</p> <p>8 question is from because I don't have any</p> <p>9 residence in Hong Kong, so I cannot register</p> <p>10 anything in Hong Kong.</p> <p>11 Q Okay. Is it your testimony, Mr. Guo,</p> <p>12 that you don't own a residence on the waterfront</p> <p>13 in Hong Kong?</p> <p>14 MR. HARMON: We're not answering</p> <p>15 that question. It's not even close</p> <p>16 to something Magistrate Freeman has</p> <p>17 permitted.</p> <p>18 THE WITNESS: What time is it?</p> <p>19 MR. HARMON: 2:40. Stay for a</p> <p>20 few more minutes.</p> <p>21 Q Mr. Guo, has Mr. Gi made any payments</p> <p>22 to any entity in the United States which you</p> <p>23 control?</p> <p>24 A No.</p> <p>25 Q Has ACA paid a million dollars to</p> <p style="text-align: right;">Page 328</p>	<p>1 GUO WENGUI</p> <p>2 Q Mr. Guo, do any of your entities have</p> <p>3 an office at the Bank of China tower in Hong Kong</p> <p>4 on the 49th floor?</p> <p>5 MR. HARMON: Object to the form</p> <p>6 of the question.</p> <p>7 A Now?</p> <p>8 Q First we'll ask now.</p> <p>9 A No.</p> <p>10 Q Have they in the past?</p> <p>11 A Never in the past either.</p> <p>12 Q So is it your testimony that China</p> <p>13 Golden Spring Hong Kong has never had an office in</p> <p>14 the Bank of China Tower 49th floor?</p> <p>15 MR. HARMON: Object to the form</p> <p>16 of the question.</p> <p>17 A Whether you are asking about me</p> <p>18 myself or the company Hong Kong Golden Spring,</p> <p>19 that company can have offices anywhere, but I</p> <p>20 don't have any office in the Hong Kong China bank</p> <p>21 office building.</p> <p>22 Q My question was about the Hong Kong</p> <p>23 Golden Spring Company. I ask for an answer to it.</p> <p>24 MR. HARMON: Your question was</p> <p>25 companies he owned. Your question</p> <p style="text-align: right;">Page 330</p>

25 (Pages 327 to 330)

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<p>1 GUO WENGUI</p> <p>2 assumed that that was his company,</p> <p>3 and that's why you have a problem.</p> <p>4 MR. GREIM: No.</p> <p>5 MR. HARMON: The way in which</p> <p>6 you form your questions, which is why</p> <p>7 I object to the form.</p> <p>8 Again, this is a subject that is</p> <p>9 outside the scope of what Magistrate</p> <p>10 Freeman permitted.</p> <p>11 I'm going to allow you to answer</p> <p>12 -- Mr. Guo to answer these questions,</p> <p>13 but you're wasting our time.</p> <p>14 MR. GREIM: No. The question</p> <p>15 was specifically on China Gold</p> <p>16 Spring, and the witness tried to</p> <p>17 answer a different one. I'm going to</p> <p>18 ask it again.</p> <p>19 Q Mr. Guo, do you deny that China</p> <p>20 Golden Spring Hong Kong has never or has ever had</p> <p>21 an office in the Bank of China tower, 49th floor?</p> <p>22 MR. HARMON: Object to the form</p> <p>23 of the question.</p> <p>24 A No.</p> <p>25 Q Has ACA shared an office with China</p> <p style="text-align: right;">Page 331</p>	<p>1 GUO WENGUI</p> <p>2 A I only introduced them to one</p> <p>3 another. I don't remember anything else.</p> <p>4 Q Does William Gi receive budget</p> <p>5 documents from either of your rule of law</p> <p>6 entities?</p> <p>7 MR. HARMON: Okay. Way beyond</p> <p>8 the scope. I'm not permitting him to</p> <p>9 answer that question.</p> <p>10 Q Who did you speak with at ACA to</p> <p>11 direct the \$500,000 wires to my client at issue in</p> <p>12 this case?</p> <p>13 MR. HARMON: Object to the form</p> <p>14 of the question. He denied in his</p> <p>15 last deposition that he ordered the</p> <p>16 wires to be made from ACA to</p> <p>17 Strategic Vision, so this is old</p> <p>18 territory. You're just wasting our</p> <p>19 time.</p> <p>20 A I had already answered this question.</p> <p>21 Q Did you confer with William Gi about</p> <p>22 ACA's wiring of money to Strategic Vision?</p> <p>23 MR. HARMON: Asked and answered</p> <p>24 at the last deposition.</p> <p>25 Q Again, Mr. Guo, please answer this</p> <p style="text-align: right;">Page 333</p>
<p>1 GUO WENGUI</p> <p>2 Golden Spring Hong Kong on the 49th floor of the</p> <p>3 Bank of China tower?</p> <p>4 A I don't know.</p> <p>5 Q Has ACA made any payments, whether</p> <p>6 for services, or loans, or distributions to golden</p> <p>7 spring Hong Kong?</p> <p>8 A I don't know.</p> <p>9 Q Has ACA made any payments, whether</p> <p>10 for services, or loans, or distributions, any</p> <p>11 payments of any kind to Golden Spring New York?</p> <p>12 A I don't know.</p> <p>13 Q Has ACA made any payments of any kind</p> <p>14 to Bill Gertz?</p> <p>15 MR. HARMON: So far outside the</p> <p>16 scope.</p> <p>17 A No. I don't remember.</p> <p>18 Q Didn't Bill Gertz send an E-mail to</p> <p>19 you with terms of a loan that he proposed that you</p> <p>20 would make to him in 2018?</p> <p>21 MR. HARMON: Object to the form</p> <p>22 of the question.</p> <p>23 A I don't remember clearly.</p> <p>24 Q Did you communicate with Mr. Gi about</p> <p>25 a payment or a loan from ACA to Bill Gertz?</p> <p style="text-align: right;">Page 332</p>	<p>1 GUO WENGUI</p> <p>2 question one last time.</p> <p>3 A No.</p> <p>4 Q Have you conferred with William Gi</p> <p>5 about ACA's collection of its loan?</p> <p>6 MR. HARMON: Object to the form</p> <p>7 of the question.</p> <p>8 A I don't remember.</p> <p>9 Q What did you discuss with William Gi</p> <p>10 in your last meeting with him?</p> <p>11 MR. HARMON: Don't answer the</p> <p>12 question. It's beyond the scope.</p> <p>13 Q Are you aware that William Gi is an</p> <p>14 advisor to provinces and cities on the mainland?</p> <p>15 MR. HARMON: Object to the form</p> <p>16 of the question.</p> <p>17 A I don't know.</p> <p>18 Q Are you aware that Mr. Gi is a member</p> <p>19 of a Hong Kong patriotic association?</p> <p>20 MR. HARMON: Object to the form</p> <p>21 of the question.</p> <p>22 A I don't know.</p> <p>23 Q Would it surprise you to learn that</p> <p>24 he was?</p> <p>25 MR. HARMON: Do you have any</p> <p style="text-align: right;">Page 334</p>

26 (Pages 331 to 334)

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<p>1 GUO WENGUI</p> <p>2 questions for this witness that are</p> <p>3 within the scope of what Magistrate</p> <p>4 Freeman permitted, because otherwise</p> <p>5 we're done.</p> <p>6 MR. GREIM: All of these are.</p> <p>7 MR. HARMON: None of them are</p> <p>8 actually.</p> <p>9 So I'm asking you if you have</p> <p>10 other questions that are within the</p> <p>11 scope.</p> <p>12 MR. GREIM: I do have other</p> <p>13 questions.</p> <p>14 MR. HARMON: Let's get them to.</p> <p>15 You know he had to leave at 2:30.</p> <p>16 You've held him here -- I've held him</p> <p>17 here for you for an additional 20</p> <p>18 minutes. I'm going to continue to</p> <p>19 hold him here a little while longer,</p> <p>20 but only if you have questions to ask</p> <p>21 that are within the scope of what</p> <p>22 Magistrate Freeman allowed.</p> <p>23 Q I would like an answer to that</p> <p>24 question.</p> <p>25 MR. HARMON: No. No.</p> <p style="text-align: right;">Page 335</p>	<p>1 GUO WENGUI</p> <p>2 between you and any person in Mainland China?</p> <p>3 A No.</p> <p>4 Q Has he acted as an intermediary</p> <p>5 between you and any person in Hong Kong?</p> <p>6 A No.</p> <p>7 Q Has Mr. Han spoken with anyone at the</p> <p>8 Hudson Institute on your behalf?</p> <p>9 A No. Never on my behalf made a speech</p> <p>10 in Hudson Institution.</p> <p>11 Q Does Mr. Gertz serve on any rule of</p> <p>12 law organization?</p> <p>13 A I think he was the board member, but</p> <p>14 I don't remember exactly.</p> <p>15 Q Are you affiliated with the rule of</p> <p>16 law organizations in any way?</p> <p>17 MR. HARMON: Object to the form</p> <p>18 of the question.</p> <p>19 A I was the biggest contributor.</p> <p>20 Q Has Mr. Gertz done any work for you?</p> <p>21 A No.</p> <p>22 Q Has he contacted other reporters in</p> <p>23 the media on your behalf?</p> <p>24 A I would not know.</p> <p>25 Q Have you ever negotiated with</p> <p style="text-align: right;">Page 337</p>
<p>1 GUO WENGUI</p> <p>2 Q Have you given anything of value to</p> <p>3 Lee Ann Shelheim? (Phonetic)</p> <p>4 A No.</p> <p>5 Q Have you given anything of value to</p> <p>6 an entity called Citizen Power Initiative for</p> <p>7 China?</p> <p>8 A No.</p> <p>9 Q Has any entity which you control or</p> <p>10 of which you are a member given anything of value</p> <p>11 either to Mr. Han or the Citizen Power Initiative</p> <p>12 for China?</p> <p>13 MR. HARMON: Object to the form</p> <p>14 of the question.</p> <p>15 A No.</p> <p>16 Q Did you pay Mr. Han for any work on</p> <p>17 your Asylum application?</p> <p>18 A No.</p> <p>19 Q What projects of yours has Mr. Han</p> <p>20 worked on?</p> <p>21 A No, none.</p> <p>22 Q Has Mr. Han talked to the media on</p> <p>23 your behalf?</p> <p>24 A I don't remember.</p> <p>25 Q Has he acted as an intermediary</p> <p style="text-align: right;">Page 336</p>	<p>1 GUO WENGUI</p> <p>2 Mr. Gertz regarding a loan of money?</p> <p>3 A I don't remember.</p> <p>4 Q Just to be clear, I mean a loan of</p> <p>5 money from any other entity, not necessarily just</p> <p>6 from you.</p> <p>7 MR. HARMON: Object to the form</p> <p>8 of the question.</p> <p>9 A No, I don't know.</p> <p>10 Q Did Mr. Gertz recently ask you for</p> <p>11 money again for investigative reporting?</p> <p>12 MR. HARMON: Object to the form</p> <p>13 of the question.</p> <p>14 A I don't remember.</p> <p>15 Q Did you discuss with Mr. Gi that ACA</p> <p>16 would receive results of the Strategic Vision</p> <p>17 Research contract?</p> <p>18 MR. HARMON: To be clear,</p> <p>19 Magistrate Freeman made it very clear</p> <p>20 that you were not to renew questions</p> <p>21 regarding the contract or the work</p> <p>22 because that was all covered in the</p> <p>23 seven-hour deposition that was</p> <p>24 originally conducted. So let's not</p> <p>25 repeat all the ground.</p> <p style="text-align: right;">Page 338</p>

27 (Pages 335 to 338)

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<p>1 GUO WENGUI</p> <p>2 Q Are you aware of the source of the</p> <p>3 funds in ACA?</p> <p>4 A I don't know.</p> <p>5 Q Are you aware of the source of any</p> <p>6 income derived by any of ACA entities?</p> <p>7 MR. HARMON: Way outside the</p> <p>8 scope. Not answering that question.</p> <p>9 Q Are you aware of the identities of</p> <p>10 any officers or directors of ACA?</p> <p>11 A I don't know.</p> <p>12 Q What is William Gi's role with ACA?</p> <p>13 A Whether a board member or a officer,</p> <p>14 I don't know exactly.</p> <p>15 Q Does William Gi answer to anyone else</p> <p>16 at ACA, any of the ACA entities?</p> <p>17 MR. HARMON: Object to the form</p> <p>18 of the question.</p> <p>19 A I don't know.</p> <p>20 Q Has ACA made any payments to</p> <p>21 Mr. Steve Bannon on behalf of the Sirotkin Media</p> <p>22 Group?</p> <p>23 MR. HARMON: Not detailed to</p> <p>24 which this witness has to testify</p> <p>25 here. He's not answering the</p> <p style="text-align: right;">Page 339</p>	<p>1 GUO WENGUI</p> <p>2 Q -- is ACA a sovereign wealth fund?</p> <p>3 A No. I don't know.</p> <p>4 Q Does it have the money of any state</p> <p>5 entity?</p> <p>6 A I don't know.</p> <p>7 Q Are the funds in ACA derived from the</p> <p>8 Crown Prince of the UAE?</p> <p>9 MR. HARMON: Object to the form</p> <p>10 of the question.</p> <p>11 A I don't know.</p> <p>12 MR. GREIM: Let's do this. I</p> <p>13 have some questions I think should</p> <p>14 have been answered. There are some</p> <p>15 points I think we should get to.</p> <p>16 Let's not hold the witness here</p> <p>17 any longer. I know he's got to leave</p> <p>18 for something.</p> <p>19 I'm going to hold it open for</p> <p>20 that purpose, and we'll just meet and</p> <p>21 confer after this.</p> <p>22 MR. HARMON: I appreciate that.</p> <p>23 We will meet and confer. If there</p> <p>24 are rulings to answer additional</p> <p>25 questions, perhaps we can work that</p> <p style="text-align: right;">Page 341</p>
<p>1 GUO WENGUI</p> <p>2 question.</p> <p>3 Q When is the last time ACA paid any</p> <p>4 expense for any of your entities?</p> <p>5 MR. HARMON: Object to the form</p> <p>6 of the question.</p> <p>7 A No.</p> <p>8 Q I'm sorry. Just to be clear, is it</p> <p>9 your testimony that ACA has never paid any expense</p> <p>10 for any of your entities?</p> <p>11 A I don't have any entity. This</p> <p>12 question is like really idiotic.</p> <p>13 Q Is ACA a sovereign wealth fund?</p> <p>14 MR. HARMON: Object to the form</p> <p>15 of the question.</p> <p>16 If you understand it, you can</p> <p>17 answer.</p> <p>18 MR. HARMON: Ask the question.</p> <p>19 If Mr. Guo understands it, he can</p> <p>20 answer it again.</p> <p>21 Q This is a term of art, and I think</p> <p>22 maybe Mr. Guo will understand. Let's try again.</p> <p>23 The question is --</p> <p>24 MR. HARMON: The term of art in</p> <p>25 English.</p> <p style="text-align: right;">Page 340</p>	<p>1</p> <p>2 out in writing.</p> <p>3 Thank you very much.</p> <p>4 THE VIDEOGRAPHER: The time is</p> <p>5 3:05 p.m., Wednesday, December 4,</p> <p>6 2019.</p> <p>7 This is the end of media 3,</p> <p>8 volume 2 of the videotaped deposition</p> <p>9 of Mr. Guo.</p> <p>10 We're off the record.</p> <p>11 (Time noted: 3:05 p.m.)</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 342</p>

28 (Pages 339 to 342)

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<p>2</p> <p>3 A C K N O W L E D G M E N T</p> <p>4</p> <p>5 STATE OF NEW YORK)</p> <p>6 ss:</p> <p>7 COUNTY OF _____)</p> <p>8</p> <p>9 I, Guo Wengui, hereby certify that I have</p> <p>10 read the transcript of my testimony taken under</p> <p>11 oath in my deposition of December 4, 2019; that</p> <p>12 the transcript is a true and complete record of my</p> <p>13 testimony, and that the answers on the record as</p> <p>14 given by me are true and correct.</p> <p>15</p> <p>16</p> <p>17 _____</p> <p>18 GUO WENGUI</p> <p>19</p> <p>20</p> <p>21 Subscribed and sworn to before me</p> <p>22 this day of 2019.</p> <p>23 _____</p> <p>24 (NOTARY PUBLIC)</p> <p>25</p> <p style="text-align: right;">Page 343</p>	
<p>2</p> <p>3 C E R T I F I C A T E</p> <p>4</p> <p>5 I, Terri Fudens, a stenotype reporter</p> <p>6 and Notary Public within and for the State of New</p> <p>7 York, do hereby certify:</p> <p>8 That the witness whose testimony is</p> <p>9 hereinbefore set forth was duly sworn by me and</p> <p>10 that such testimony is a true record of the</p> <p>11 testimony given by such witness.</p> <p>12 I further certify that I am not related</p> <p>13 to any of the parties by blood or marriage, and</p> <p>14 that I am in no way interested in the outcome of</p> <p>15 this matter.</p> <p>16 IN WITNESS WHEREOF, I have hereunto set</p> <p>17 my hand.</p> <p>18</p> <p>19</p> <p>20</p> <p>21 _____</p> <p>22 Terri Fudens</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: right;">Page 344</p>	

29 (Pages 343 to 344)

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Page 1

<p style="text-align: center;">A</p> <p>a.m 235:19 239:4 a/k/a 234:10 235:15 236:21 ability 239:16,22 291:25 292:6 able 244:24 254:9 292:15 absolute 253:17 absolutely 261:4 285:14 285:16,25 320:5 abused 263:9 AC 319:6 ACA 319:12,14 322:11 322:13,15,21 323:3,10 324:6,7,9,14,23 325:2 325:7,10,14,17 327:9 327:13,20,21 328:25 329:16 331:25 332:5,9 332:13,25 333:10,16 338:15 339:3,6,10,12 339:16,16,20 340:3,9 340:13 341:2,7 ACA's 333:22 334:5 accept 258:14 accidents 265:6 account 248:20 252:6,13 252:17,18,19,20,23,24 accountant 250:13 accurate 269:7 276:13 accurately 239:14,20 accusations 300:24 accuse 275:8 acted 336:25 337:4 action 293:21 activities 326:11 actual 244:23 AD0BC41 234:25 addition 254:14 additional 335:17 341:24 address 328:5 329:25 admit 303:15 advice 307:16 324:14 327:4 advisor 334:14 affiliated 337:15 afraid 325:11 against- 234:6,9 agenda 309:22 agents 263:18 ago 243:21 244:19 293:2 318:12 agree 246:25 274:18 283:7 306:17,21,23 agreed 293:24 307:8 agreement 241:18,20,21 241:24 ahead 264:23 265:15 276:24 299:7 314:8 315:10 317:9 323:11 airport 270:16 allegations 283:8 alleged 324:25 allow 273:23 281:22 331:11 allowed 256:19 278:7 324:19 325:25 327:17</p>	<p>329:14 335:22 ambiguous 249:20 259:24 America 271:22 Americans 254:6 Ann 336:3 announce 261:20 299:21 answer 248:10 249:22 250:24 253:11 254:22 254:23 255:6,9,17,18 255:20 256:8,16,19 258:6,10,15,16 259:13 263:14 264:19 265:3 266:19 272:16 273:13 281:16 296:25 307:4 308:3 312:7 322:23 325:23 329:6,11 330:23 331:11,12,17 333:9,25 334:11 335:23 339:15 340:17 340:20 341:24 answered 248:9 253:14 260:17,18 272:22 276:21 306:25 319:9 322:17 323:6 329:3,8 333:20,23 341:14 answering 258:4 273:12 275:14 328:14 339:8 339:25 answers 239:15,21 268:5 343:13 anti-communist 320:9 320:16,21 anti-communists 320:19 anticorruption 293:12 anybody 317:2 anyway 250:21 apartment 278:2 280:20 280:23 281:3,6 286:16 appeal 248:25 appear 301:8,15 319:25 appearance 300:21 302:9 303:17 appeared 297:21 append 246:11 application 336:17 appreciate 341:22 approach 300:2 305:2 Approximately 251:21 April 244:4 267:7,7 268:2,10,22 270:2 287:13 Arabic 245:16 arch 290:9 291:10 art 340:21,24 asked 246:16 248:9 253:14 257:23 258:18 259:14 264:3,3,11 265:19 266:6,10 267:6 267:23 272:21 273:9 273:11 275:15 306:25 314:10 316:8 319:8 322:17 323:5 329:3,8 333:23 asking 241:23 251:7,11 259:19 270:20 273:7 274:9 279:12,19</p>	<p>290:19 305:5,6 312:3 314:3 330:17 335:9 asks 313:6 assets 281:23 assisted 272:12,17 association 334:19 assumed 331:2 Asylum 336:17 ATKINSON-BAKER 234:22 attack 261:5 attempt 252:16 attempted 270:14 attorney 252:10 Attorneys 236:3,9,21 attorneys' 329:2 audio 241:13 274:19,20 274:25 275:17 276:2 August 297:8,10,12 306:6,23 307:8 309:20 authentic 245:2 299:11 301:5 313:17 authenticating 310:8 312:2 313:24 314:5 authenticated 313:23 authenticity 313:19 314:14 315:9 Avenue 235:18 236:22 aware 277:19,25 278:9 307:25 319:5 326:10 326:15,22 327:20 334:13,18 339:2,5,9</p> <p style="text-align: center;">B</p> <p>B 238:7 back 239:8 240:6 241:23 243:25 265:11 267:2 274:4 277:16 288:15 292:17 310:13,15 316:3,16 326:5,7 background 283:23 285:6 Bal 289:9 bank 330:3,14,20 331:21 332:3 Bannon 296:12,17 297:4 339:21 based 312:5 329:17 Basically 273:21 basics 265:13 basis 313:13 Bates 238:10 243:11,16 243:18 bathroom 260:3 beginning 255:13 287:11,23 298:21,21 310:4 begins 238:9 243:11,16 298:8,14 behalf 306:11 336:23 337:8,9,23 339:21 Beijing 319:3 believe 249:24 262:8 274:12 294:3 297:4 329:7,9 believes 256:18 believing 260:4 best 239:16,22</p>	<p>better 255:11 beyond 278:6 296:22 327:16 329:9 333:7 334:12 biggest 259:11 337:19 Bill 332:14,18,25 billions 258:25 259:2,4,5 bit 246:6 black 238:9 243:9,15 blood 344:13 Bo 262:8 board 337:13 339:13 body 262:23 263:3 break 260:3 276:25 299:20 302:5 315:11 brief 256:13 277:9 315:12,21 broadcast 297:18 300:3 300:12 302:23 308:11 broken 263:10 brother 263:6 287:18,20 brothers 261:22 brought 282:11 284:5,11 budget 333:4 building 330:21 business 327:5</p> <p style="text-align: center;">C</p> <p>C 236:2 239:11,11 343:3 344:3,3 C-E-N-G 262:10 C-H-E-E-N 298:7 call 243:7 250:11 318:20 321:8 called 261:15 262:8 324:7 336:6 Calling 318:21 calls 308:13 321:11,12 campaign 293:12 camp 254:4 Capital 324:7 car 265:6 care 312:20 case 234:6 240:13 241:22 243:20 246:8 285:10 333:12 catch 273:19 CCI 251:13 CCP 240:11,18 242:10 242:22 249:5,11,16 251:9,12,12,13,15,23 261:6 267:25 268:9,21 269:9,25 275:2 277:20 278:10,18 283:8 295:3 295:17,23 296:3,9,13 296:14 297:7 303:23 304:13 306:6,10 307:22 308:6 309:11 323:21 CCP's 311:21 cell 267:19 275:21 Ceng 262:9 certain 240:10 272:23 certified 285:9,11,19 certify 343:9 344:7,12 chairman 322:4 Chang 237:6 241:6,16 248:2 250:7 251:3</p>	<p>257:13,18 259:23 261:17 262:6 265:17 266:23 270:20 273:18 279:2 291:15 292:3 294:16 297:11 301:19 307:12 308:23 312:11 313:8 314:21 change 267:23 characterization 244:22 266:12 characterize 320:15 characters 245:16 charge 262:16 charges 282:11 cheater 305:6 cheaters 254:8 260:5 check 256:7,7,10 273:6 checking 256:6 Cheen 298:5 Chen 299:16 300:13 309:25 310:19 311:3 313:5 314:17,24 Chen's 313:11 Chi 296:18 301:2 Chian 291:25 292:6 children 295:18,22 Chin 300:22 China 257:8 263:2 267:11 282:12 289:17 292:2,7,8,15 293:18 304:8 322:5 330:3,12 330:14,20 331:15,19 331:21,25 332:3 336:7 336:12 337:2 chinese 245:5 257:21 259:16,18,25 260:8 261:6 270:9,23 273:25 274:14 285:6,8 286:4 290:13 291:18 300:23 318:2 320:18 Ching 292:2,6 Chinger 292:14 Chong 326:23 CHRIS 236:6 CHUFF 236:6 CIA 262:25 263:18 293:2 cities 334:14 citizen 318:9 336:6,11 City 236:10 280:24 329:18 claim 253:12 claimed 320:9 clarification 310:14 clarify 268:5 274:2 clarifying 270:23 clarity 274:15 clear 252:25 258:9,15 284:10 288:4 289:22 310:9 314:15,16,23 338:4,18,19 340:8 clearly 269:13 322:24 332:23 client 312:15 319:19,23 321:24 333:11 clip 271:21 284:9,19 287:7,11 302:9 303:16 clips 301:4 close 328:15</p>
---	--	---	---	--

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Page 2

<p>closer 300:5 collection 334:5 come 288:15 300:4 308:24 319:11,16,20 coming 292:22 commandeering 266:3 commencing 235:19 comments 279:25 committed 263:2 communicate 296:2,8 296:12 332:24 communicated 295:3 323:25 communications 240:11 240:17 241:10 295:16 304:12 communist 260:11 275:5 300:24 320:23 320:25 companies 330:25 company 261:23 272:17 304:8 323:4 330:18,19 330:23 331:2 complete 258:10,16 343:12 complying 259:15 265:16 component 286:18 computer 299:13 306:2 computers 309:4 comrade 289:13 concerns 293:17 conclusion 293:23 condition 268:15 292:18 conducted 240:10 338:24 confer 290:12 293:12,17 333:21 341:21,23 conference 293:11 326:23 conferred 334:4 confidence 253:18 254:5,6 258:5,21 259:8 263:19 confiscated 258:22 confiscating 261:21 connections 327:5 Connolly 329:2 consent 277:21 278:3,12 consider 293:21 consists 243:15 Consultative 326:23 contacted 337:22 contains 246:12 content 293:13 302:14 continue 258:3 265:3 313:2 335:18 Continued 234:15 235:15 256:22 262:12 277:17 continues 305:21 continuing 243:24 313:21 contract 240:13,20 325:2 338:17,21 contributions 282:2,5 contributor 337:19 control 262:5 323:4,10</p>	<p>324:22 325:10 328:23 336:9 conversation 242:9,14 242:18,22 244:3,8,10 244:18 245:23 249:11 249:16 250:5 251:8,10 251:15,17,18,19 252:7 252:9 261:13 263:4,7 263:16 265:20 267:16 278:10 282:19 287:13 294:23 conversations 250:25 251:4,22 264:12,17 265:4 266:7 275:6 276:15,16,19,23 convey 295:22 cook 260:2 copy 246:24 247:2,9 Corporation 234:4 235:5 236:4 correct 257:16 297:22 298:11 307:11 311:15 314:18 343:14 corrected 271:25 counsel 236:16 240:21 246:16,17 247:23 249:24 260:23,23 261:2 285:18 301:13 307:6 308:20 311:11 counsel's 257:5 273:9 counterclaim 234:11 235:16 236:22 239:23 countries 318:8 country 282:2,5 318:8 COUNTY 343:7 course 267:11 294:8 court 234:2 235:2,18 239:9 240:8 243:20 248:25 278:7 317:18 325:19,21 326:4 cover 243:18 covered 338:22 crazy 275:3 291:3 critics 260:8 cross 303:24 310:23 311:13 Crown 341:8 cutting 264:7 266:13</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>D 236:12 238:2 343:3 D.C 269:16 288:10 daily 321:12 DANIEL 236:19 date 243:13 282:19 daughter 261:22 287:16 day 243:8 281:6 287:10 287:21,23 288:7 321:8 343:22 days 281:10,11 282:17 288:3 December 234:18 235:20 239:5 277:3,12 315:15,24 342:5 343:11 declaration 325:18 declined 293:3 deeper 261:24</p>	<p>defendant 234:5,11 235:6,16 236:4,22 239:23 Defendant-Countercla... 235:17 Defendant/Countercla... 234:8 236:9 Defendants/Countercl... 235:9 define 242:2 definitely 286:5 definitively 308:5 Del 237:5 Delaware 236:5 delete 255:22 deleted 256:3,4,11 312:18 denied 313:17 324:22 333:14 deny 302:8,22 303:15 306:5 308:5,9 313:10 314:16,23 331:19 deposition 234:15 235:15 239:7 277:7,14 288:23 305:9,11 315:18 316:2,7 319:9 320:8 322:18 323:6 333:15,24 338:23 342:8 343:11 depositions 246:10,22 derived 339:6 341:7 DESCRIPTION 238:8 deserved 260:9 destroy 262:2 263:21 detailed 339:23 details 266:9 290:6 325:6,15 detained 254:3 259:6 263:5,8 270:15 detaining 261:22 detains 291:11 detention 263:9 287:14 determine 244:25 298:25 299:10 device 284:5,11 die 253:19 260:9 died 265:6 differ 285:12 different 250:19 268:19 270:25 285:20,22,24 285:25 286:3,5 291:18 331:17 direct 296:25 333:11 directions 255:8 directly 295:6 316:17 319:19 325:15 director 319:5,11 327:9 directors 339:10 disagree 257:12 discuss 282:10 307:21 334:9 338:15 discussed 282:4 discussing 309:24 discussion 250:22 252:2 263:11 265:9 267:5 274:4 discussions 265:12 266:21 267:8,15</p>	<p>270:18 275:22 276:2,3 276:9 277:20,25 278:18 287:10,22 292:16,20 293:23 294:3 dish 260:2 displayed 300:3,9 302:23 dispute 250:17 disrupting 305:8,11 distributed 279:8 distributions 325:2 332:6,10 DISTRICT 234:2,2 235:2 235:3 document 305:25 documents 333:5 doing 257:23 265:10 dollars 328:25 DONNELLI 236:13 drafted 303:3 drawn 265:6 drive 246:11,24 247:3,6 247:10,12 279:9 duly 239:12,18,24 344:9</p> <hr/> <p style="text-align: center;">E</p> <hr/> <p>E 236:2,2,17 238:2,7 239:23 343:3,3 344:3 344:3 E-mail 318:20 332:18 earlier 249:5,10 250:23 258:20 262:16 287:12 297:21 earth 263:22 East 292:22 329:17,22 Eastern 234:4 235:5 236:4 241:22 easy 252:6 302:6 edgreim@gravesgarr... 236:12 EDWARD 236:12 effort 252:10,22 288:22 either 245:5 253:9 295:18,22 330:11 333:5 336:11 element 274:20 Emirates 322:21 employees 254:3 259:7 261:23 263:8 291:14 291:16,17 ends 243:18 enemies 291:10 enemy 259:11 290:9 English 244:2 245:4,14 252:18 259:16,19 273:11,16 274:5 285:8 285:15,22 286:4 324:11 340:25 entire 274:3 279:15 285:2 entities 330:2 333:6 339:6,16 340:4,10 entitled 296:23 entity 259:12 319:6,14 324:6,13,14 327:4,21 328:22 329:17 336:6,9 338:5 340:11 341:5</p>	<p>entourage 270:14 271:3 271:13,17 equipment 272:9 erase 263:21 ERIN 236:25 especially 284:24 ESQ 236:6,12,13,19,24 236:25 Everybody 320:6 everybody's 314:6 exact 259:18 exactly 257:22 261:18 269:13 272:16 298:4 321:16 337:14 339:14 examination 238:3 240:4 256:22 262:12 277:17 316:5 329:4 examine 323:2 examined 240:2 excerpt 280:8 execution 240:12,20 241:24 exhibit 243:4,8,9,14 244:22 246:9 exist 272:19 existed 314:13 existence 307:25 expense 340:4,9</p> <hr/> <p style="text-align: center;">F</p> <hr/> <p>F 344:3 fabricated 308:11 face 263:21 301:6 312:24 facial 316:19 fact 284:13,19 292:14 296:24 fair 241:14 245:8 faith 253:17 fake 252:7,16 253:3,7,8 278:14,18,22 301:4 fakery 276:14 false 266:4,5 327:7 family 253:23 259:6,7 261:21 263:5,9 281:2 281:12 287:14 291:11 323:13,21 far 280:9 325:10 332:15 fashion 265:15 fast 253:19 FBI 262:25 263:18 270:15 fee 275:9 fees 275:11 329:2 FILE 234:25 filibustering 264:9,11 filibusters 264:22 filings 325:19 find 248:21 252:10 262:22 263:3 fine 242:5 finish 256:19 257:6 279:16 finished 253:25 254:19 255:17 261:23 263:14 263:23 firm 292:23 first 239:24 240:9 248:14</p>
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Page 3

<p>252:12 265:13 268:7 276:25 279:21 285:3 288:7 293:13 316:7 318:22 320:8 321:13 323:24 330:8 five 265:21 300:6 flash 246:10,24 247:2,9 247:12 279:9 floor 330:4,14 331:21 332:2 follow-up 293:25 following 239:15,21 279:24 283:14 follows 240:3 forces 261:25 forget 312:16 form 244:21 249:18 250:20 252:14 253:4 253:13 255:16 257:3 257:25 269:5,17 270:6 270:11 271:8,18 272:14,20,25 274:22 276:5,11 277:22 278:20 281:7,14,19 282:7,13,23 284:7,15 286:12,20 287:3 288:12 290:4,18 291:7 291:22 294:6,11 295:8 295:13,19 296:6,20 298:3 300:14 301:11 302:11,19,24 303:4,8 303:12,18,25 304:14 304:20 306:7,12,19 307:3,18,23 308:7,12 308:18 309:14 310:24 311:4,5 314:19 315:2 318:5,16 319:7 320:11 321:19 322:7 323:17 324:16 326:12,18,24 327:15,24 329:19 330:5,15 331:6,7,22 332:21 333:13 334:6 334:15,20 336:13 337:17 338:7,12 339:17 340:5,14 341:9 formed 252:19 322:15 forth 240:8 292:17 344:9 foundation 312:5 four 318:18 framework 329:13 fraudster 248:23 fraudsters 249:2 freely 292:2,7 Freeman 322:25 324:19 325:4 328:16 329:10 331:10 335:4,22 338:19 French 237:3 frequently 318:15 friends 300:25 304:5 frightened 321:5 front 238:9 243:10,16 306:2 Fudens 234:24 235:20 239:12,18,25 344:5,21 fund 340:13 341:2 funds 339:3 341:7 further 316:15 344:12</p>	<p style="text-align: center;">G</p> <p>G 239:11,23,23 272:2 326:22 343:3 G-U-O 252:20 gap 259:17 garbage 261:8 GARETT 236:8 Ge 292:2,6 general 253:17 265:9 Gertz 332:14,18,25 337:11,20 338:2,10 gestures 316:20 getting 263:25 264:21 264:22 325:14 Gi 301:9,17 302:17 309:21 318:15,22 320:9,15,20,24 321:13 321:17 323:13,19,25 326:15 327:4 328:21 332:24 333:4,21 334:4 334:9,13,18 338:15 339:15 Gi's 293:11 323:20 326:10 327:3 339:12 Gian 302:18 317:25 Giangu 301:10 Ging 300:21,23 301:8,16 Gion 291:4 give 255:7,9 256:8 258:11 268:18 298:19 308:24 309:16 313:11 324:14 327:4 given 285:9 303:22 309:18 336:2,5,10 343:14 344:11 go 241:23 259:25 260:12 264:23 265:12,14,15 276:24 279:17 288:10 299:7 300:5 310:13,14 314:8 315:10 316:14 317:9 323:9,11 329:24 goes 283:13 317:11 325:15 going 243:6,7 246:18 255:18 263:24 264:18 265:11 266:18 274:11 275:16 279:7,20 283:11 284:23 285:2 292:21 297:15 299:23 299:25 300:4,5,17 304:25 310:4 314:15 317:2,6,14,16 322:22 325:23 331:11,17 335:18 341:19 Gold 331:15 golden 236:16,16 324:13 325:3 330:13,18,23 331:20 332:2,6,11 Good 239:3 government 260:8 261:15 263:20 321:3 321:14 GRAVES 236:8 greater 322:5 greatly 286:3 Greim 236:12 238:5 240:5 241:2,11 242:5 243:3,14 244:6,11</p>	<p>245:24 246:5 247:8,11 254:16,25 255:4,10,24 256:9,23,25 257:10,16 260:20 262:13 264:5,8 264:15,21 273:20 274:17 275:12 276:24 277:18 278:4,8 279:14 279:16,20 280:4 283:21 285:14,23 297:2 298:11,13,16 299:2,7 304:7,10,25 305:12,16,20 307:11 310:9,12 311:15 312:14,25 314:8 315:10 316:6,14 317:4 317:17 319:18,22 320:3,7 323:7,9 325:12 326:3 329:5 331:4,14 335:6,12 341:12 ground 338:25 Group 324:7 339:22 Gui 253:17 Guiang 289:9 Gun 269:14,23 Guo 234:10,16 235:15 236:21 238:4,8 239:7 240:1,6 241:1 242:1 243:1,8,9,14 244:1,8 244:10,24 245:1,17,19 246:1,17,18,20 247:1 247:14,19 248:1 249:1 250:1 251:1 252:1,25 253:1,9 254:1 255:1 256:1,18 257:1 258:1 258:8 259:1 260:1,7 261:1 262:1 263:1 264:1 265:1,8 266:1 267:1 268:1 269:1 270:1 271:1 272:1 273:1 274:1 275:1 276:1 277:1,7,15,19 278:1 279:1 280:1 281:1 282:1,21 283:1 283:11,22 284:1 285:1 286:1,9 287:1 288:1 289:1 290:1 291:1,25 291:25 292:1,6,6,11 292:14 293:1 294:1 295:1,6,11 296:1 297:1,20 298:1 299:1 299:12,25 300:1,8,20 301:1 302:1,8 303:1 304:1 305:1,8 306:1,5 307:1 308:1 309:1 310:1,19 311:1,17,22 312:1 313:1,3 314:1 315:1,18 316:1,3,7 317:1 318:1 319:1 320:1 321:1 322:1,20 322:23 323:1 324:1 325:1 326:1 327:1,3,8 328:1,11,21 329:1 330:1,2 331:1,12,19 332:1 333:1,25 334:1 335:1 336:1 337:1 338:1 339:1 340:1,19 340:22 341:1 342:9</p>	<p>343:9,18 guy 261:15,20 305:6</p> <p style="text-align: center;">H</p> <p>H 238:7 239:11 Haitong 327:14 half 293:2 309:25 HAMILTON 236:3 Han 336:11,16,19,22 337:7 hand 243:6 344:17 happen 265:7 happened 275:17,21 282:19 hard 257:21 harm 253:22 Harmon 236:24 242:2,7 244:6,20 245:12,24 246:20 247:8,17 248:4 248:9 249:18 250:2 252:14 253:4,13 254:23 255:2,7,12,15 255:22 256:9,15 257:3 257:25 258:8 259:13 260:16,25 264:2,6,10 264:16 266:4,11 269:4 269:17 270:6,11 271:8 271:18 272:14,20,25 274:10,18,22 276:5,11 277:22 278:4,20 279:5 279:14,18 280:3 281:7 281:14,19 282:7,13,23 283:20 284:6,15 285:11 286:12,20 287:3 288:12 290:4,18 290:24 291:7,21 294:6 294:11,18 295:7,13,19 296:5,20 298:2,10,12 298:14,19,23 299:4,8 300:14 301:11 302:3 302:11,19,24 303:4,8 303:12,18,25 304:14 304:20 305:10,14,18 305:22 306:7,12,19,25 307:18,23 308:7,12,18 309:3,13 310:6,11,24 311:4,22 312:13,20 313:12 314:19 315:2 316:24 317:6,13 318:5 318:16 319:7,16,20 320:5,11 321:19 322:7 322:16,22 323:8 324:16 325:4,22 326:12,18,24 327:15 327:24 328:14,19 329:3,7,19 330:5,15 330:24 331:5,22 332:15,21 333:7,13,23 334:6,11,15,20,25 335:7,14,25 336:13 337:17 338:7,12,18 339:7,17,23 340:5,14 340:18,24 341:9,22 hatred 253:20 hear 244:25 264:17 266:8 283:22,25 284:4 284:10 311:2,17 heard 280:9 283:24</p>	<p>284:10 287:11 289:2 324:6,9 held 235:18 335:16,16 hell 260:12 help 262:11 309:21 hereinbefore 344:9 hereunto 344:16 hired 327:4 hit 299:12 300:5 HODGSON 236:21 hold 245:18,18 263:13 335:19 341:16,19 holding 293:11 Holdings 327:9 home 321:5 Hong 254:13,15 262:18 321:3,14 323:14 324:13 327:9,22 328:2 328:4,6,9,10,13 330:3 330:13,18,20,22 331:20 332:2,7 334:19 337:5 hospitalized 321:6 host 300:9 302:16 hotels 328:6 hour 287:7 309:25 hours 261:14 263:7,11 263:16 264:14 265:20 266:7,21 267:5 271:5 276:8,15 287:13 housekeeping 246:6 Hua 304:6 Hudson 337:8,10 huge 312:6 313:23 hundreds 258:22 259:2 264:13 266:7 267:22 301:3 Hypothetical 308:19</p> <p style="text-align: center;">I</p> <p>idea 248:22 identical 286:5 identification 243:13 identified 244:14 316:8 identify 244:18 245:22 246:4 301:6 311:24 313:5 identifying 245:25 identities 339:9 idiot 309:7 idiotic 340:12 image 248:17 images 285:5 important 263:6 imposter 253:12 In-House 236:16 in-person 276:2 284:20 inaudible 301:2 includes 319:6 including 263:5 inclusion 313:14 income 339:6 incorrect 323:7,8 independently 313:25 indicate 284:5,11,19 information 262:17 323:20 Initiative 336:6,11</p>
--	--	---	---	--

Atkinson-Baker, Inc.
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Page 4

<p>inquire 296:23 inside 243:17 Institute 337:8 Institution 337:10 intelligence 311:20 intend 286:2 interested 344:14 intermediary 297:5 336:25 337:4 Internet 243:2 274:21,25 275:2,6,8,11 276:10 276:23 278:3,11,19 280:17 301:4 306:16 interpret 248:13 249:21 260:22 261:2 273:10 273:15 274:12 301:25 308:22 interpretation 250:14 interpreted 302:4 interpreter 237:6,7 239:11,17 240:21 241:4,6,8,15,16 246:15 247:22 248:2 248:12 249:23 250:3,7 251:3,14 253:24 254:11 257:5,13,18 258:24 259:3,10,15,23 260:21,22 261:17 262:3,6,7 264:25 265:16,17 266:23 267:3 270:20 273:5,6 273:10,18,24 274:7,11 278:23 279:2 285:17 287:17 291:13,15 292:3 294:14,16 297:10,11 301:13,19 301:22,24 307:6,12 308:20,23 311:11 312:9,11,22 313:8 314:21 315:4 317:15 321:7 interpreters 239:10 interpreting 294:21 interrupt 265:18 268:16 268:17 interrupted 310:14 interview 271:20 273:3 302:14 314:12,17 315:5,6 interviewed 297:18 315:7 interviews 303:20 introduced 333:2 investigative 338:11 Investment 324:9 327:9 investors 322:21 involvement 327:11 involving 325:7 issue 241:22 333:11</p> <hr/> <p style="text-align: center;">J</p> <p>J-E 317:20 January 242:10 jdonnelli@gravesgarr... 236:14 Je 317:20,21,23 JENNIFER 236:13 JGK 234:6</p>	<p>Jing 258:5 272:2 297:17 297:19,22 302:9 job 312:12 join 322:11,13 Jong 309:21 Journal 272:6,8 273:4 Ju 291:4 302:18 June 242:3,4,10 269:9 269:10,12,21 270:10</p> <hr/> <p style="text-align: center;">K</p> <p>K 239:17 343:3 Kansas 236:10 Kay 317:23 keep 281:23 319:25 keeps 305:17 312:23 kidnap 270:15 kill 254:6 262:21 263:20 321:9 killed 262:22 263:2 killing 263:17 321:11 kind 241:17 332:11,13 King 326:23 know 244:9 245:3,5 246:2 248:24 250:10 252:4,8,19 253:7,15 259:25 261:17 265:5,7 273:6 274:16 275:20 275:24 276:7 277:24 278:24 279:7 289:7,8 289:9,11 295:9 303:6 304:22 306:14 307:14 309:4,15 316:12,13 317:12,20,24,25 318:3 318:7,8,10,25 319:13 319:15 320:17,20,24 321:17 322:4,19 323:12,22 324:24 326:14,20 327:2,10,11 328:2,3,7 329:21 332:4,8,12 334:17,22 335:15 337:24 338:9 339:4,11,14,19 341:3 341:6,11,17 knowing 324:22 knowledge 325:9,16 knows 273:13 Kong 254:13,15 262:18 321:3,15 323:14 324:14 327:9,23 328:3 328:4,6,9,10,13 330:3 330:13,18,20,22 331:20 332:2,7 334:19 337:5 Kowol 289:5,7,9,12 Kwok 234:10 235:16 236:21 314:3</p> <hr/> <p style="text-align: center;">L</p> <p>L 239:17 343:3 label 238:9 243:10,15 lasted 264:13 lasts 287:7 late 294:25 law 333:5 337:12,16 lawsuit 324:25 lawyer 305:5</p>	<p>lawyers 248:23 leader 253:23 254:2,4,5 254:7,10,13,15 259:9 leader's 311:21 leaders 261:6 leaked 311:19 learn 334:23 leave 254:14,21 312:19 322:10 335:15 341:17 Lee 292:16 336:3 left 294:4,10,25 legal 318:4 legs 263:10 let's 256:20 257:11 266:3 274:10,16 276:24 315:10 324:19 326:4 329:12 335:14 338:24 340:22 341:12 341:16 letter 295:12 297:7 300:2 300:8 301:9,17 302:17 302:22 303:3 304:13 304:23 306:6,9,10,18 306:22,24 307:10,17 307:21 308:2,5,11,16 309:2,5,6,8,12,16,18 309:19,24 310:20 Li 269:14,22 270:4 292:21 Li's 290:14 lie 253:22 283:2 309:23 lies 300:25 lieu 270:13,18 limited 234:4 235:5 289:23 291:5 322:24 323:3 324:10 325:8 line 303:22 310:23 311:14,18 313:7 316:18 325:21 listen 245:21 252:11 265:23 266:19 listened 244:13 248:19 249:4,9 252:2 253:3 280:16 282:17 283:4 313:3,4 listening 246:3 284:18 little 262:15 300:4 335:19 Liu 242:14,18 251:16 252:2 261:10,13 262:14 263:8,17 266:22 267:5 271:3,12 271:16,24 275:19,23 276:3,4,9,20 280:10 280:22 281:5,22,25 282:4,10,22 283:7 284:4,10,14,21 286:10 286:25 287:10,23 288:8,10 289:12,17,23 290:2 291:5,19,24 292:5,20 293:6,10,13 293:16,20,24 294:4,10 294:25 295:5,10 live 253:22 292:18 328:6 LLC 234:7 235:8 236:8,9 LLP 236:3 loan 332:19,25 334:5 338:2,4</p>	<p>loans 329:16 332:6,10 locations 323:18 long 263:25 268:5 284:24 longer 272:19 275:14 335:19 341:17 looking 248:11,16 292:23 316:24 lot 268:4 316:19 love 253:23 254:2,3,9,12 lying 316:23</p> <hr/> <p style="text-align: center;">M</p> <p>M 343:3 M-E-N-G 262:10 magistrate 322:25 324:19 325:4,12 328:16 329:10 331:9 335:3,22 338:19 main 236:10 273:24 mainland 281:23 323:15 324:15 326:11,16 327:5 334:14 337:2 maintain 310:22 making 245:15 253:21 272:12 300:24 312:12 321:10,12 man 316:8 Management 324:10 Mandarin 244:2 Mang 301:10 map 285:6 Maquary 322:5,10 March 242:23 244:4 249:6,10,15 250:6,22 251:9,19,23 253:16 255:14 257:9,15,20 260:7,14 261:11 267:7 268:2,10,21 270:2 282:20,22 287:12 MARK 236:24 marked 243:12 284:24 Market 236:4 marking 301:23 marriage 344:13 matter 265:9 278:5 344:15 matters 320:10,16 mean 240:16 241:7 250:14 259:20,21 260:6 338:4 means 311:18 measure 269:7 media 239:5 262:5 271:17 272:3,4 277:5 277:13 301:15 303:17 308:10 310:2 315:16 315:25 336:22 337:23 339:21 342:7 meet 269:22,25 270:4,9 281:5,10 288:15 318:22 341:20,23 meeting 271:3 280:10,19 280:22 281:3 284:20 286:10 288:11 289:4 295:11 296:18 329:25 334:10 meetings 271:12,16</p>	<p>272:10 275:18 281:13 288:7,16,19 Mei 291:25 292:6,11,14 295:6,11 member 242:9 326:22 334:18 336:10 337:13 339:13 members 259:7 260:11 263:5,9 281:2 287:15 291:11 Meng 262:9 290:16,22 290:25 291:4 293:8 mentioned 244:18 325:18 mentioning 290:10 messages 295:23 296:3 296:9,13 met 270:13 282:25 293:2 296:19 metallic 283:25 Miami 293:2 microphones 271:11 middle 292:21 299:20 Miles 234:10 235:16 236:21 million 254:4 328:25 millions 258:22 259:2 290:25 301:3 MIN 272:2 mine 259:7 298:14 Ming 297:17,18,22 300:21,23 301:8,16 302:9,18 317:23,25 Ministry 289:13 minute 280:2 297:17 298:22 299:3 300:7,18 310:18 313:4 minutes 244:19 265:21 279:21 285:3 287:7 298:24 299:9 300:6,19 310:15 328:20 335:18 Mira 303:17 308:10 309:25 missed 311:9 Missouri 236:10 modern 261:6 moment 298:19 299:23 money 322:20 325:14 333:22 338:2,5,11 341:4 month 269:20 months 240:19 241:24 243:21 269:12 318:12 324:4 morning 239:3 mother 321:4 move 254:16 256:20 258:13 266:14 274:16 275:12,16 304:7,10 324:20 moving 317:8 Muslims 254:4</p> <hr/> <p style="text-align: center;">N</p> <p>N 236:2 238:2 239:11,17 239:17,17,23 343:3,3 naked 253:21 name 251:16 252:20</p>
---	--	--	---	---

Atkinson-Baker, Inc.
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Page 5

<p>262:15 268:13,17 291:2 297:24 298:5,6 306:3 317:20,23,25 318:2,4 319:6 named 262:9 names 263:18 268:6,18 289:25 316:12 317:10 324:11 narrative 263:25 narrow 266:15,16 278:5 nation 261:7 national 311:19 nearly 263:16 necessarily 338:5 need 297:5 298:23 325:20 needs 274:14 317:5 negotiate 291:24 292:5 negotiated 337:25 negotiation 240:19 neither 303:15 network 262:17 311:20 never 248:18,19 252:4 258:21 260:10,10 261:4,8 262:24 273:22 276:14 292:9 301:15 306:9 330:11,13 331:20 337:9 340:9 new 234:2,17,17 235:3 235:18,19,21 236:16 236:17,17,23,23 239:13,19 240:2 250:21 254:17 255:14 255:19 257:7 258:7 267:23 280:23 288:11 289:24 290:3 294:4,10 294:25 318:14 320:7 329:18 332:11 343:5 344:6 nodding 316:20 non-party 246:21 non-responsive 275:13 304:11 nonresponsive 254:17 North 236:4 Notary 235:21 239:13,19 239:25 343:24 344:6 Note 245:12 noted 315:20 342:11 number 238:10 239:6 243:4,11,17,18 259:11 267:21 277:5,13 315:17,25</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>O 239:11,17,23 343:3 oath 343:11 object 244:20,21 249:18 252:14 253:4,13 257:3 257:25 264:6,18 266:11,12 269:17 270:6,11 271:8,18 272:14,20,25 274:22 276:5,11 277:22 278:20 281:7,14,19 282:7,13,23 284:15 286:12,20 287:3 288:12 290:4,18 291:7</p>	<p>294:6,11 295:13,19 296:20 300:14 301:11 302:11,19,24 303:4,8 303:12,18,25 304:14 304:20 306:7,12,19 307:18,23 308:7,12,18 310:24 311:4,22 313:12 314:19 315:2 316:16 318:5,16 319:7 320:11 321:19 322:7 323:16 324:16 326:12 326:18,24 327:15,24 329:19 330:5,15 331:7 331:22 332:21 333:13 334:6,15,20 336:13 337:17 338:7,12 339:17 340:5,14 341:9 objection 245:12 249:22 250:20 253:6 255:15 269:4 284:6 291:21 295:7 296:5 298:2 307:2 309:3,13 obtained 248:23 295:12 obvious 265:10 obviously 248:17 294:20 occasion 318:23 occurred 244:4 October 296:19 offer 281:22 office 318:23,24 329:22 329:24 330:3,13,20,21 331:21,25 officer 339:13 officers 339:10 offices 327:22 330:19 official 240:18 242:23 249:5,12,17 251:9,16 261:19 278:11 295:3 295:24 296:13,14 307:22 officials 251:23 268:2,7 268:10,21 269:9 270:2 270:9 277:21 278:19 289:16,25 290:7,13 291:18 293:18 295:17 296:3,9 297:8 303:23 306:6,11 Okay 241:15 269:11 275:12 278:8 283:18 305:10 328:11 333:7 old 289:13 333:17 once 284:25 285:4 315:8 ongoing 326:10 open 264:12 266:6,17,19 341:19 operation 255:13 256:24 257:7,8,15,20,22 259:17,19 opinion 260:15 opposing 260:11 order 235:18 258:13 274:15 ordered 333:15 orderly 265:14 orders 240:8 organization 272:3,4 310:22 311:13 337:12 organizations 337:16</p>	<p>originally 338:24 outcome 344:14 outside 322:24 324:18 331:9 332:15 339:7 overseas 262:16 owned 330:25 ownership 323:3,10 324:21,23 325:9</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>P 236:2,2 p.m 277:3,12 315:15,20 315:24 342:5,11 page 238:9 243:9,15,23 243:24,25 245:10 279:24 283:15 298:8 310:20 pages 238:3,8 243:23 245:20 paid 275:9 328:25 340:3 340:9 PAP 240:12 part 252:23 284:18 286:22 particular 251:6 282:19 287:7 303:21 310:21 parties 243:20 344:13 party 244:3 260:11,11 275:5,9 300:24 320:23 320:25 patriotic 293:21 334:19 pay 336:16 paying 275:4 payment 332:25 payments 325:7 328:21 329:16 332:5,9,11,13 339:20 pending 248:5 people 251:5 261:5 262:11 265:5 271:24 275:4 291:2 321:3,8 321:14 PEPPER 236:3 percent 248:20 253:20 327:7 period 242:3 permit 322:22 permitted 323:2 328:17 329:10 331:10 335:4 permitting 333:8 persecuted 320:23,24 323:14,21 persecuting 321:14 person 247:20 251:17 259:8 262:15 267:9 269:22,25 270:10 289:11 290:10 291:9 291:11,12 296:2,8 311:24 317:21,24 337:2,5 personal 259:5 personally 262:2 pertains 241:25 phone 256:6 267:8,12,19 267:21,23 269:8,15 275:21,22 276:3,9,19 283:4 290:2,12,23 291:10,12,19 312:19</p>	<p>312:23 319:24 321:11 321:12 phones 267:22 320:6 phonetic 262:19 269:15 289:5,10 290:17 292:7 292:15,21 301:10 302:18 309:21 322:6 336:3 photographs 255:23 photos 256:2 320:2 pick 251:5 pictures 256:11 279:11 280:5,6 312:13,16,18 pieces 302:6 Ping 242:14,18 251:16 252:3 258:5 261:10 262:14 266:22 267:5 270:4 271:3,13,16,24 275:19,23 276:3,4,9 276:20 280:10 286:11 Ping's 309:21 pinning 270:4,13,18 place 263:12 278:2 280:19 286:15 placed 278:3,11 280:17 305:25 Plaintiff 234:8 235:9,17 236:9 Plaintiff/Counterclaim 234:5 235:6 236:3 planning 279:15 play 245:19 246:14,18 247:7 279:7,20 283:11 284:23,25 285:2 286:6 298:9,20,23 299:12,19 300:5,17 310:4 played 246:23 247:13 248:7 283:17 286:7 287:24 299:22 305:3 310:17,18 playing 246:2 247:5 279:12,15 280:5 299:9 310:6,10,12 please 243:22 255:7,22 255:25 257:2 265:25 312:25 319:17,20 329:12 333:25 PODHASKIE 236:19 323:16 point 247:3 264:9 273:7 316:15 pointing 312:23 points 341:15 police 321:4 Political 326:23 portion 266:25 267:16 276:16 297:17 303:16 326:6 position 247:4 297:2 possible 273:17 294:20 post 275:6 276:8,18 posted 244:4 274:19,24 275:7 276:22 postings 278:22 power 261:25 336:6,11 praise 281:25 PRC 240:12,18 242:10 242:22 249:5,11,16</p>	<p>251:9,14,23 268:2,10 268:21 269:9 270:2 277:20 278:10,18 295:3,17,24 296:3,9 296:13,14 303:23 304:13 306:6,11 307:22 308:6 309:11 prepare 309:8,11 present 237:2 252:24 281:3,12 282:22 President 293:11 301:9 302:17 309:21 previous 255:18 previously 279:8 Prince 341:8 prior 240:19 problem 331:3 Problematic 245:13 Profit 234:4 235:5 236:4 241:22 program 297:25 project 259:22,24 260:2 260:4,5,6 projects 336:19 promise 293:6,10,16 309:20 promote 309:21 property 258:23 259:6,6 261:21 proposed 332:19 provide 247:2,9 274:15 307:16 providing 316:25 provinces 334:14 public 235:21 239:13,19 239:25 283:9 292:23 293:18 343:24 344:6 publicize 275:10 publicizing 293:17 punished 261:7 purchase 327:14 purpose 341:20 purposes 319:24 pursuant 235:17 put 254:4 311:19 320:6</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>Qua 313:16 question 240:7,9 241:25 244:16,21 245:8 246:17 247:14 248:4,6 249:19,21 250:15,18 250:20,21,24 252:15 253:5,10,14 254:17,22 254:24 255:3,5,9,16 255:21 256:16,20,21 256:24,25 257:4,6,11 257:12,17 258:2,12,17 258:19,21 259:14 260:13,17,19 263:13 263:14 264:12 265:4 265:15,19 266:2,6,10 266:16,17,17,20 268:7 268:8 269:11,18 270:7 270:12 271:9,19 272:15,21 273:2,8,9 273:14,21 274:2,23 276:6,12,21 277:23</p>
--	---	--	--	--

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Page 6

<p>278:6,21 279:5 280:4 280:8 281:8,15,16,20 282:8,14,24 284:7,9 284:16 286:13,21 287:4,9,21,22 288:13 289:22 290:5,19 291:4 291:8,22 292:11 294:7 294:12,24 295:8,14,20 296:6,21 298:3 300:15 301:12,14,20,25 302:3 302:5,12,20,25 303:5 303:9,13,19 304:2,15 304:19,21 305:15,19 305:23,24 306:8,13,20 307:3,7,19,24 308:2,8 308:13,19,21,22 309:14 310:5,25 311:2 311:5,6,8 312:3,7,10 313:2,6,11,13,15 314:7,9,20 315:3 318:6,17 319:8 320:12 321:20 322:8,23 323:17 324:17 325:20 325:24 326:13,19,21 326:25 327:16,25 328:8,15 329:12,20 330:6,16,22,24,25 331:14,23 332:22 333:9,14,20 334:2,7 334:12,16,21 335:24 336:14 337:18 338:8 338:13 339:8,18 340:2 340:6,12,15,18,23 341:10 questioned 313:18 questioning 325:8 questions 239:15,21 255:6,18,19 258:4,7 264:19,20 275:15 297:25 301:23 305:5,7 308:25 313:22 314:3 316:8,10,21 322:16 323:5 325:6 331:6,12 335:2,10,13,20 338:20 341:13,25 quite 289:21 290:6</p> <hr/> <p style="text-align: center;">R</p> <p>R 236:2 239:11 344:3 raise 317:18 raised 273:6 raped 254:13 raping 254:15 read 245:14 267:2 326:5 326:7 343:10 reading 244:17 really 248:21 250:24 251:24 258:3 267:12 276:7 284:22 303:6 317:13 318:25 325:24 327:10 340:12 reason 262:14 recall 249:14,25 250:2,4 250:9,10 271:6 272:16 282:15 284:17,22 287:5,25 288:6,9 289:4 294:15,23 297:9 302:15 303:22 304:24</p>	<p>309:24 318:25 319:4 320:8 recalls 294:22 receive 304:12 333:4 338:16 received 325:2 recess 256:13 277:9 315:12,21 recognize 286:9 299:16 300:8,12 301:5 305:25 record 239:8 241:9,10 241:11 245:25 246:12 247:18 250:12 256:12 256:17 258:9,15 267:2 272:9 274:14 277:8,16 283:19 285:4 288:19 297:6 300:17 315:19 316:4 326:7 342:10 343:12,13 344:10 recorded 248:8 recording 240:16,23,24 240:25 241:3,5,5,12 242:17,21,25 244:14 244:24 247:21,25 248:15 249:3,4,8,9,15 250:4,9,11,12,13 251:10,18,25 253:3 267:17,20 270:21,22 270:23,24 272:6 274:24,25 276:14 279:10,13 280:7,9,12 280:15,16 282:17 283:4,5,12,16,23 284:5,11,20,25 285:3 286:10,19,23,24 287:24 288:3 289:2 311:25 312:2 314:2 recordings 240:10,15,17 242:8,13 251:2 267:14 270:17 271:2,7,12,16 272:13,19 274:20,21 275:18,22 276:2,17,19 276:22 277:20 278:9 288:23 recruit 322:10 red 303:22 310:23 311:13,18 313:6 reference 244:23 245:15 referred 246:7 referring 241:19,21 304:3,9 refers 245:5 reflect 247:18 256:17 regarding 283:8 293:18 307:17 323:2 324:15 338:2,21 register 291:16 328:9 registered 327:22 rejected 293:3 related 324:21 344:12 relations 292:23 relationship 325:17 remember 251:6,24 269:6,13 271:10 272:11 280:21,22 281:18,21 282:3,16 284:8 288:21 289:3,6 289:15 290:6,15</p>	<p>291:23 292:24 293:5,9 293:15,19,22 295:4,15 297:14 298:4 302:21 303:2,10,14,21 304:17 310:3 311:7,16 312:8 314:9 316:10 320:13 321:16,23 322:12 324:2,5,8,12 326:9 329:15 332:17,23 333:3 334:8 336:24 337:14 338:3,14 renew 338:20 repeat 249:7 266:24 273:10,14 279:3 301:20 309:17 314:22 338:25 repeated 258:19 282:25 reply 258:20 report 296:17 REPORTED 234:24 reporter 235:21 239:9 297:19,24 326:4,8 344:5 reporters 337:22 reporting 338:11 represent 244:11 287:6 297:17 representation 313:15 representative 261:14 representing 254:9 300:23 reputation 262:2 requested 266:25 326:6 Reread 256:25 Research 338:17 residence 327:22 328:3 328:4,9,12 respond 311:18 response 258:12 263:25 304:13 313:11 results 338:16 resume 294:4 retained 324:14 return 288:20 292:19 returned 255:14 257:7 257:14 ridiculous 252:5 254:7 293:15 296:16 305:13 326:21 right 241:10 248:25 256:5 260:24 280:2 302:2 307:9 312:13 320:23 321:9 role 339:12 rule 320:7 333:5 337:11 337:15 rulings 341:24 RUSS 236:21</p> <hr/> <p style="text-align: center;">S</p> <p>S 236:2 238:7 239:17 saying 247:23 248:14 261:3 273:19 289:15 301:14 309:6 says 245:13 scope 278:6 296:22 297:3 322:25 324:18 327:16 329:9 331:9</p>	<p>332:16 333:8 334:12 335:3,11,21 339:8 screen 285:13,21 286:25 299:17 300:3,9 sea 265:6 search 240:10 288:22 second 265:11 288:7 299:24 seconds 287:8 300:19 secretaries 293:7 secretary 253:17 290:16 290:22 291:4 301:10 302:17 section 280:16 283:12 322:5 securities 322:5 327:14 Security 289:14 see 243:24 245:10 255:10 272:24 279:10 279:11 290:11 299:2,5 299:13,13 318:11,15 seen 248:18 275:5 306:15 send 306:10 332:18 sending 306:5 Senior 297:7 sense 250:15 326:2 sent 261:15 306:9 308:5 September 296:18 326:16 serious 263:6 serve 337:11 served 297:4 services 332:6,10 set 240:7 265:11 344:9 344:16 seven-hour 338:23 Shan 290:8 296:18 301:18 share 271:15 272:5 shared 271:21 272:3,7 331:25 Shelheim 336:3 Shin 262:19 show 297:15 shown 286:25 302:9 303:16 Si 258:5 side 319:17 sight 316:18 sign 303:7 signals 317:2 signature 305:25 306:4 silverware 284:2 simply 302:14 314:17,25 single 327:21 sir 241:21 251:7 255:20 279:7 285:3 297:15 301:7 305:24 310:5 Sirotkin 339:21 sit 266:18 site 245:9 262:8 sitting 319:18 six 240:19 241:23 298:24 299:9 sleeping 311:21 small 267:16 276:16 social 318:23</p>	<p>sole 327:8 solicit 322:20 son 292:8,10 327:8,12 son's 327:11 sorry 278:15 281:17 283:3 340:8 sound 283:25 sounds 293:14 source 245:3,6,9 252:11 275:10 307:14 313:20 339:2,5 SOUTHERN 234:2 235:3 sovereign 340:13 341:2 speak 248:2 267:25 268:9 269:8,14 273:24 289:16 290:22 291:19 333:10 speaking 300:10 311:24 specifically 325:5 331:15 specify 261:12 speculation 308:14 speech 326:16 337:9 spell 251:12 262:15 spelling 261:18 spend 268:4 spies 275:4 spoke 289:25 290:20 294:9 295:5 spoken 285:7 295:11 337:7 spring 236:16,16 324:13 325:3 330:13,18,23 331:16,20 332:2,7,11 spy 275:5,8 ss 343:6 stake 327:14 stand 241:2 standard 261:20 standing 316:16 start 257:11,14,19 299:21 313:5 started 257:23 259:21 319:14 starts 283:12 state 235:21 239:13,19 240:2 289:13 341:4 343:5 344:6 statement 266:5,5 310:21 312:3 States 234:2 235:2 261:25 270:5 292:19 309:22 321:18 323:23 328:22 static 280:5,6 stay 317:3,6 328:19 329:12 stereotype 235:20 344:5 steps 293:25 Steve 296:12 339:21 stick 250:8 stop 263:24 265:25,25 265:25 266:3 279:22 279:25 283:20 293:7 299:21,23 304:6 305:8 313:8 317:5 stopped 283:18 286:8 299:24 300:6,18</p>
--	--	---	---	--

Atkinson-Baker, Inc.
www.depo.com

Page 7

<p>316:22 storing 275:25 story 268:19 strange 290:9 Strategic 234:7 235:8 236:9 241:23 333:17 333:22 338:16 Street 236:4,10,17 272:6 272:7 273:4 329:17,23 strike 254:16 275:13 304:7,10 subject 265:9 278:5 331:8 submitted 243:19 Subscribed 343:21 substance 279:6 Suite 236:5,10,22 Sun 269:14,22 292:21,25 Sung 301:2 sure 243:3 247:16 249:8 252:17,23 256:10 278:15 296:24 298:17 299:4 305:4 312:17 surprise 334:23 SVUS 238:10 243:11,12 243:17,19 298:8 SVUS1320 298:11 swear 239:9 sworn 239:12,18,24 343:21 344:9</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>T 238:7 239:11 343:3 344:3,3 table 255:25 Taiwan 254:15 262:18 take 260:3 263:12 268:5 276:25 280:19 293:24 294:16 299:9 307:12 312:20 315:11 321:3 taken 235:16 255:23 256:14 277:10 278:2 286:15 315:13,22 343:10 talk 240:23 261:10 262:17,25 268:20 269:2 282:22 283:8 291:9,12 293:3 301:8 312:14 325:25 talked 292:9,12 336:22 talking 240:22,24 241:9 292:22 293:7 301:16 304:4 305:17 tape 286:6,7 298:21,24 310:4,6 313:18,19 technical 252:6 telecom 304:8 tell 241:6 245:6,21 260:7 263:15 265:22 268:13 268:16 289:12,24 292:25 295:10 302:16 314:11 315:8 321:13 323:13 telling 265:24 321:8 tens 250:25 251:5 258:24 259:3,5 term 340:21,24 terms 241:19 270:25</p>	<p>306:17,22,24 307:8 332:19 Terri 234:24 235:20 239:12,18,25 344:5,21 territory 333:18 TESKE 236:25 testified 240:3 249:4,9 250:23 297:21 testify 339:24 testimony 253:2 258:11 272:18 278:17 281:17 282:21 283:3 301:7 308:4,10 327:17 328:11 330:12 340:9 343:10,13 344:8,10,11 Thank 242:7 246:5 274:17 294:18 310:11 342:3 thing 285:2 291:17 307:15 320:4 things 262:20 think 243:5 247:22 252:4 279:3 294:13 296:21 297:20 299:8,25 306:3 337:13 340:21 341:13 341:15 third 235:18 236:22 275:9 288:7 310:20 Thomas 237:5 thousands 250:25 251:5 321:11 threatened 263:17 threatens 291:11 threats 287:15 321:4 three 270:14 271:24 281:11,11 282:16 285:3 288:3 318:18,18 threw 267:24 Ti 290:7 tie 301:6 time 239:4 247:12 256:13 264:25 265:22 267:10,13,23 268:4,5 274:10 277:2,9,11 283:2,16 286:7 287:2 288:25 289:5,17,23 290:2,13,21 291:5 292:9 294:9,13 295:2 299:6,22 305:2,3,21 307:2 310:16 312:6 313:24 314:6,12 315:12,14,20,21,23 323:24 325:23 328:18 331:13 333:19 334:2 340:3 342:4,11 timeframe 268:3 times 281:11 318:18,19 timing 251:21 302:13 today 246:14 260:15 288:23,25 306:15 told 259:18 260:13 261:24 262:14 263:18 265:4,21 287:12 320:22 321:2 323:19 top 245:10 topics 240:7 total 261:8 275:3 309:7 309:23</p>	<p>totally 306:21 316:23 touch 262:25 tough 312:12,12 tower 330:3,14 331:21 332:3 traders 261:6 transcribed 245:20 285:7 297:16 transcript 244:7,17 266:3 279:23 283:15 343:10,12 transcription 243:25 245:4,7 285:8,21 288:5 298:8 transfers 325:13 translate 239:14,20 253:5 264:23 302:7 translated 265:2 274:4 translation 244:2 257:19 285:10,12,15,19,20 286:4 294:17 307:13 translations 265:11 274:5,6 transmit 303:11 travel 292:2,7,15 treatment 292:17 tried 266:2 331:16 trip 270:5 trouble 250:8 true 253:16 278:13 298:17 320:14 327:3 343:12,14 344:10 Trump 304:4 trust 310:22 311:10,12 try 279:17 329:12 340:22 trying 273:18 turn 243:23 TV 302:10 two 239:10 248:23 249:2 254:8 260:5 268:18 270:24 275:3 279:21 285:5 292:25 293:24 318:12,18 type 279:15 309:5 typed 309:5 typically 297:25</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>U 239:17,23,23 U.S 257:14 262:5 267:11 292:22 UAE 341:8 Uet 292:14 UK 270:5 Una 237:7 unable 310:7 understand 241:17,18 245:4 250:17 252:18 259:20 265:13 273:20 278:16 304:3,16,18 305:4 340:16,22 understands 340:19 United 234:2 235:2 261:25 270:5 292:19 309:22 321:18 322:21 323:23 328:22 use 243:7 267:21 271:11 272:9 290:12 309:4</p>	<p>313:25 327:13</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p>V 235:7 239:11 Vague 249:19 validate 302:13 314:13 314:18,25 value 336:2,5,10 Vecchio 237:5 verify 247:4,4 Victor 237:6 video 245:11,20 246:7,8 246:12,19,22 247:5,6 247:7,18,19,20,24 248:8,16,18,23 270:23 271:2,7,15,21,23 272:4,5,8 274:24 275:17,25 279:8,22 280:4 284:24 285:7 286:18,22,24 297:16 297:19 298:12,13,18 299:22 300:21 305:3,6 310:7,10,16 313:4,6 313:16,20 314:24 315:5,6 317:14,16 videographer 237:5 239:3 277:2,11 315:14 315:23 316:17 342:4 videos 246:13 272:24 311:19 320:2 videotaped 239:6 277:6 277:14 315:17 316:2 342:8 view 300:2 Vision 234:7 235:8 236:9 241:23 333:17,22 338:16 visit 290:14 visiting 269:15 289:17 289:23 290:2 291:5,20 VOA 271:20 272:2 voice 240:22,25 241:5 241:12,13,13 244:15 245:22 247:15,20,24 248:7,7,8,15,17,19 253:9,11 270:21,22,24 271:12,15,21 272:5 274:20 279:10,13 280:6,9 voices 283:22 volume 239:6 277:6,13 315:17,25 342:8</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p>W 239:17,23 343:3 W-E-I 262:10 Wa 291:25 292:6 Wall 272:6,7 273:3 Wallop 237:3 256:4 Wan 296:18 Wang 237:4 290:7 293:7 301:2 316:16,25 319:18 320:4 Wang's 312:17 want 245:3,6 247:17 248:18,21,24,24 251:2 252:8,9,25 253:7,19 254:20,20,21,22 256:7</p>	<p>258:3,6,20 262:21 263:15,20,20 264:16 265:3,7,13,23 266:8 266:13 268:4,6,13,16 268:18 273:21 274:3 278:15 304:5 305:4 307:14 312:17 314:2 316:15 wanted 251:12 265:8 wants 254:5 warned 262:17,24 Washington 269:16 288:10,17,20 wasn't 257:12 258:16 265:10 waste 267:10,13 299:6 312:6 313:23 wasteful 314:5 wasting 307:2 325:22 331:13 333:18 watched 313:10 watching 248:15 waterfront 328:12 way 247:16 250:14 281:16 286:2 294:21 295:5 300:6 324:17 325:10 331:5 333:7 337:16 339:7 344:14 ways 294:22 we'll 242:5 246:11 255:10 274:5 312:19 312:20 317:18 325:20 330:8 341:20 we're 243:4,7 246:18 263:24 264:21,22 275:14,15 315:19 325:14 328:14 335:5 342:10 wealth 340:13 341:2 website 245:9 Wednesday 235:19 239:4 277:3,12 315:15 315:24 342:5 weeks 324:3 Wei 262:9 304:6 welcome 240:6 Wengui 234:10,16 235:15 236:21 238:4 239:7 240:1 241:1 242:1 243:1 244:1 245:1 246:1 247:1 248:1 249:1 250:1 251:1 252:1 253:1 254:1 255:1 256:1 257:1 258:1 259:1 260:1 261:1 262:1 263:1 264:1 265:1 266:1 267:1 268:1 269:1 270:1 271:1 272:1 273:1 274:1 275:1 276:1 277:1,7 278:1 279:1 280:1 281:1 282:1 283:1 284:1 285:1 286:1 287:1 288:1 289:1 290:1 291:1 292:1 293:1 294:1 295:1 296:1 297:1 298:1</p>
---	--	---	---	--

Atkinson-Baker, Inc.
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Page 8

<p>299:1 300:1 301:1 302:1 303:1 304:1 305:1 306:1 307:1 308:1 309:1 310:1 311:1 312:1 313:1 314:1 315:1,18 316:1 316:3 317:1 318:1 319:1 320:1 321:1 322:1 323:1 324:1 325:1 326:1 327:1 328:1 329:1 330:1 331:1 332:1 333:1 334:1 335:1 336:1 337:1 338:1 339:1 340:1 341:1 343:9,18 Wengui's 279:25 went 321:4 WHEREOF 344:16 wide 264:11 266:6,17,19 wife 261:22 287:15 292:13 311:21 Wilkinson 237:7 240:21 241:4,8,15 246:15 247:22 248:12 249:23 250:3 251:14 253:24 254:11 257:5 258:24 259:3,10 260:21 262:3 262:7 273:5 274:7 278:23 285:17 287:17 291:13 294:14 297:10 301:13,22 307:6 308:20 311:11 312:22 315:4 317:15 321:7 William 316:9 317:20,21 317:22 318:2 326:10 333:4,21 334:4,9,13 339:12,15 Williams 329:2 willing 273:23 Wilmington 236:5 wires 333:11,16 wiring 333:22 wisdom 275:7 withdraw 250:19 witness 238:3 239:10 243:6,22 244:12,13,16 245:13 248:13,14 255:5,8 257:2 262:4 264:7,8,10,19,24 265:2 266:2,13 273:7 273:11,16,25 274:8 278:24 296:25 305:2 305:17 307:7 312:7 316:18 328:18 331:16 335:2 339:24 341:16 344:8,11,16 witness' 244:15 250:18 325:16 Wong 309:8 word 241:3 250:8 259:18 259:19,24 words 245:10 work 322:2 336:16 337:20 338:21 341:25 worked 320:9,14 336:20 working 320:18 works 255:11 world 285:6</p>	<p>worth 298:24 wouldn't 256:8 306:14 329:5 write 297:7 writing 342:2 written 302:17 308:16 309:2 wrote 301:9,17 302:22 307:9 Wu 261:15 Wung 301:17 Www.depo.com 234:23</p> <hr/> <p style="text-align: center;">X</p> <hr/> <p>X 234:3,12 235:4,9 238:2 238:7 X-I-O-P-I-N-G 298:7 Xi 258:22 Xioping 298:7 Xun 262:8</p> <hr/> <p style="text-align: center;">Y</p> <hr/> <p>Yan 251:16 252:3 270:4 Yang 262:19 270:13,18 year 240:12 242:4 318:19 326:17 years 293:2 yell 290:11 York 234:2,17,17 235:3 235:18,19,22 236:16 236:17,17,23,23 239:14,20 240:2 255:14 257:8 280:23 288:11 289:24 290:3 294:5,10,25 318:14 329:18 332:11 343:5 344:7 YouTube 245:9 248:21 252:6,12,24 279:11 285:5 Yu 292:13 316:9 317:11 317:22,25 Yuan 242:14,18 261:10 262:14 266:22 267:5 271:3,12,16,24 275:19 275:23 276:3,4,9,20 280:10 286:11 Yun 292:21 Yvette 237:4 309:8 319:16,20</p> <hr/> <p style="text-align: center;">Z</p> <hr/> <p>Zheng 261:16</p> <hr/> <p style="text-align: center;">0</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p>1 239:6 242:10 245:11 246:8,12 248:8 259:11 277:6 10 238:9 243:8,9,14 268:21 100 248:20 253:20 261:14 263:7,11,16 265:20 266:21 267:4 276:8,15,15 287:13 327:7</p>	<p>10065 236:17 10158 236:23 11:03 235:19 11:09 239:4 1100 236:10 12:29 277:3 12:40 277:12 13/14 245:10,20 13/15 245:21 1305 238:10 243:11,17 1313 236:4 1314 243:23 1315 243:25 1320 298:9,10 1331 298:14 1363 279:24 1374 283:15 1375 283:15 1440 238:10 243:12,19 162 236:17 329:17 164 329:17,22 18-cv-2185 234:6 19 287:7 19801 236:5</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p>2 239:6 254:4 277:6,13 277:14 280:2 315:17 315:17 316:2 342:8 2:08 315:15,20 2:19 315:24 2:30 335:15 2:40 328:19 20 268:24 335:17 20:30 283:13 2015 321:18 323:24 327:13 2016 242:4 2017 242:10,15,19,23 244:5 249:6,10,15 250:6,22 251:9,20,23 253:16 255:14 257:9 257:15,20 260:8,14 261:11 267:7 268:10 268:22 269:9 270:2,10 280:24 295:2,17,23 296:4,10,15,18,19 297:8 306:6,23 307:9 309:20 327:5 2018 242:11 327:6 332:20 2019 234:18 235:20 239:5 277:13 315:16 315:25 342:6 343:11 343:22 21:30 283:13 21:33 283:18,21 23-minute 279:21 2300 236:22 240 238:5 243 238:9 24th 288:5 270 254:3 259:6 2700 236:10 288-3376 234:22 29 244:4 287:8</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p>3 315:25 342:7 3:03 286:8 3:05 342:5,11 32 299:24</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>4 234:18 235:20 239:5 277:12 297:16,19 298:12,13,18 310:7,10 315:15,24 342:5 343:11 49th 330:4,14 331:21 332:2 4A 298:15,16 4th 277:4</p> <hr/> <p style="text-align: center;">5</p> <hr/> <p>5:11 300:18 500,000 333:11 5100 236:5 53 300:7 56 300:19</p> <hr/> <p style="text-align: center;">6</p> <hr/> <p>6 242:10 298:22 300:18 605 235:18 236:22 64105 236:10 646.218.7616 236:23 64th 236:17 329:17,23</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p style="text-align: center;">8</p> <hr/> <p>8 279:8 8:09 310:15 8:44 310:18 800 234:22 807 310:5 816.2563181 236:11</p> <hr/> <p style="text-align: center;">9</p> <hr/> <p>9 284:24 917.941.9698 236:18</p>
---	---	--